

Message

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**From:** Kime, Robin [Kime.Robin@epa.gov]  
**Sent:** 6/13/2017 10:09:41 AM  
**To:** Bolen, Brittany [bolen.brittany@epa.gov]  
**Subject:** Fwd: Confirming the 6/13 Meeting with Brittany Bolen  
**Attachments:** Comments by the Rubber Manufacturers Association to Docket ID No. EPA-HQ....pdf; ATT00001.htm

Good morning,  
I will make sure this info is in your binder for today. Have a good day,

Sent from my iPhone

Begin forwarded message:

**From:** "Michael K. Henry" <mhenry@alpinegroup.com>  
**Date:** June 12, 2017 at 10:49:21 PM EDT  
**To:** "Kime, Robin" <Kime.Robin@epa.gov>  
**Cc:** "bolen.brittany@epa.gov" <bolen.brittany@epa.gov>, Greg Means <gmeans@alpinegroup.com>  
**Subject:** RE: Confirming the 6/13 Meeting with Brittany Bolen

Sorry I am so slow in turning around the background info for tomorrow's meeting with Brittany (copied). Attached please find USTMA's comments for Evaluation of Existing Regulations. This is probably the best backgrounder for insights into the TMA perspective.

On the apology front, I have one more. I had a bad ski accident before Easter and had hoped I would be in a condition to make this meeting. Unfortunately, I am still getting around in a wheelchair and feel it's better that I not attend. Instead, my partner, Greg Means will be joining – Greg is not only a founder of our firm, he is an upgrade from me! That said, I hoped to make the meeting and am sorry to miss. His cellular is Ex. 6

Please do not hesitate to reach out to either of us if you need anything in advance of the meeting.

Thank you!

mike

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**From:** Kime, Robin [mailto:Kime.Robin@epa.gov]  
**Sent:** Monday, June 12, 2017 8:21 AM  
**To:** Michael K. Henry <mhenry@alpinegroup.com>  
**Subject:** RE: Confirming the 6/13 Meeting with Brittany Bolen

Much appreciated!

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**From:** Michael K. Henry [mailto:mhenry@alpinegroup.com]  
**Sent:** Monday, June 12, 2017 8:19 AM  
**To:** Kime, Robin <Kime.Robin@epa.gov>  
**Subject:** Re: Confirming the 6/13 Meeting with Brittany Bolen

I hope you had a good weekend!

Sorry for the delay, but we are all set to meet at 11a tomorrow. With respect to materials, I'm still waiting to receive them and will follow up asap. However, in the meantime, following are the attendees:

Tracey Norberg (Senior Vice President & General Counsel; US Tire Manufacturers Association)

Jesse Levine (Manager, Regulatory Affairs; TMA)

Sarah Amick (Vice President EHS&S and Senior Counsel; TMA)

Courtney Titus Brooks (Director, Government Relations; TMA)

Mike Henry (Alpine Group)

As you have likely noticed, the Rubber Manufacturers Association has been renamed since we set up the meeting to the US Tire Manufacturers Association. New logo, email and name to better reflect the mission and membership. Otherwise, completely the same entity.

Thank you!

Mike

On Jun 11, 2017, at 9:45 AM, Kime, Robin <[Kime.Robin@epa.gov](mailto:Kime.Robin@epa.gov)> wrote:

Good morning,  
I hope you are well. I just wanted to confirm Tuesday's 11:00 a.m. meeting with Brittany. Would you mind sending me any read-ahead material tomorrow and also the list of attendees? Thanks very much and take care.  
Robin

-----Original Appointment-----

**From:** Inge, Carolyn **On Behalf Of** Bolen, Brittany

**Sent:** Thursday, May 25, 2017 11:38 AM

**To:** Bolen, Brittany; [mhenry@alpinegroup.com](mailto:mhenry@alpinegroup.com)

**Cc:** Kime, Robin; Inge, Carolyn; Jesse Levine; Sarah Amick; Tracey J. Norberg

**Subject:** Rubber Manufacturers Association (RMA)

**When:** Tuesday, June 13, 2017 11:00 AM-11:30 AM (UTC-05:00) Eastern Time (US & Canada).

**Where:** DCRoomARN3500/OPEI

Directions: Please use the **William Jefferson Clinton North Entrance located on your right as you exit the Federal Triangle Metro Station**. Please arrive 20 minutes prior to the meeting with photo IDs to clear Security.

EPA Contact: For an escort from Security to the meeting call (202) 564-4332; for all other matters call Robin Kime (202)564-6587.

Request: Any chance you have time in the next week or so to meet with me and a client, the Rubber Manufacturers Association (RMA). We would like to come in and discuss issues in your purview relative to the domestic tire manufacturers - including the nanomaterial reporting rule, residual risk and technology review, Phase 2 rule, biomass and TSCA implementation. Following are some bullets from a letter they transmitted in May, just to give you some color of what's currently on their radar.

- RMA encourages EPA to meet the court deadline (2018 or 2020) for completing the RTR review of the Tire MACT
- RMA members are committed to effective implementation of the Frank R. Lautenberg Chemical Safety for the 21<sup>st</sup> Century Act (LCSA).
- RMA recommends that EPA stay the effective date of the nanomaterial reporting rule until guidance is issued to clarify reporting obligations in the rule.
- RMA encourages EPA to accept RMA's petition for reconsideration of the Phase 2 rule and issue technical corrections to address the issues raised.
- RMA recommends that EPA designate biomass as carbon neutral and remove the burden of ASTM testing to determine the biogenic fraction of tire-derived fuel (TDF).

Message

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**From:** Mary Manibusan [Manibusan.Mary@epamail.epa.gov]  
**Sent:** 2/21/2020 9:09:16 PM  
**To:** Brittany Bolen [Bolen.Brittany@epamail.epa.gov]  
**CC:** William Lovell [Lovell.William@epamail.epa.gov]; Wooden-Aguilar, Helena [Wooden-Aguilar.Helena@epa.gov]; Auther, Larry [Auther.Larry@epa.gov]; Tyree, Robin [Tyree.Robin@epa.gov]; Pritchard, Eileen [Pritchard.Eileen@epa.gov]; Nickerson, William [Nickerson.William@epa.gov]; Curry, Bridgid [Curry.Bridgid@epa.gov]; Corrales, Mark [Corrales.Mark@epa.gov]; Muellerleile, Caryn [Muellerleile.Caryn@epa.gov]; Wiggins, Lanelle [Wiggins.Lanelle@epa.gov]; Kramer, Melissa [Kramer.Melissa@epa.gov]; Elman, Barry [Elman.Barry@epa.gov]; Brown, Stephanie N. [Brown.StephanieN@epa.gov]  
**Subject:** OP Policy Review - ORPM Office Director Approval Notification (SAN 6715 - NPRM / OMB Review / Review #1 / OAR - 'Biogenic CO2 Rulemaking')

Approval for OMB Transmittal: NPRM - 'Biogenic CO2 Rulemaking'

This Policy Review is ready for OP Associate Administrator Approval.

Link to Policy Review Document-> 



Message

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**From:** Bolen, Brittany [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31E872A691114372B5A6A88482A66E48-BOLEN, BRIT]  
**Sent:** 9/17/2019 6:02:37 PM  
**To:** Tyree, Robin [Tyree.Robin@epa.gov]  
**Subject:** FW: Meeting Materials - Biogenic CO2 Rulemaking Follow-up  
**Attachments:** Idsal Briefing 9-18-19\_Biogenics.docx

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**From:** Baker, Sarah <baker.sarah@epa.gov>  
**Sent:** Tuesday, September 17, 2019 1:56 PM  
**To:** Leopold, Matt (OGC) <Leopold.Matt@epa.gov>; Schwab, Justin <Schwab.Justin@epa.gov>; Srinivasan, Gautam <Srinivasan.Gautam@epa.gov>; Doster, Brian <Doster.Brian@epa.gov>; Greenglass, Nora <Greenglass.Nora@epa.gov>; Dunham, Sarah <Dunham.Sarah@epa.gov>; Bolen, Brittany <bolen.brittany@epa.gov>; Elman, Barry <Elman.Barry@epa.gov>  
**Cc:** Vetter, Cheryl <Vetter.Cheryl@epa.gov>  
**Subject:** Meeting Materials - Biogenic CO2 Rulemaking Follow-up

Please find attached the briefing materials for tomorrow's Biogenic CO2 Rulemaking follow-up currently scheduled for 1:30 pm. Thank you.

Respectfully,  
Sarah

Sarah Baker  
Environmental Protection Specialist  
Air Quality Policy Division, Operating Permits Group  
U.S. EPA, Office of Air Quality Planning and Standards  
(919) 541-4846 / [baker.sarah@epa.gov](mailto:baker.sarah@epa.gov)

Message

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**From:** Bolen, Brittany [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31E872A691114372B5A6A88482A66E48-BOLEN, BRIT]  
**Sent:** 2/21/2020 9:46:26 PM  
**To:** Jackson, Ryan [jackson.ryan@epa.gov]  
**Subject:** FW: OP Policy Review - OP Associate Administrator Notification (SAN 6715 - NPRM / OMB Review / Review #1 / OAR - 'Biogenic CO2 Rulemaking')

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**From:** Brittany Bolen <Bolen.Brittany@epamail.epa.gov>  
**Sent:** Friday, February 21, 2020 4:46 PM  
**To:** Nickerson, William <Nickerson.William@epa.gov>  
**Cc:** William Lovell <Lovell.William@epamail.epa.gov>; Wooden-Aguilar, Helena <Wooden-Aguilar.Helena@epa.gov>; Auther, Larry <Auther.Larry@epa.gov>; Tyree, Robin <Tyree.Robin@epa.gov>; Curry, Bridgid <Curry.Bridgid@epa.gov>; Corrales, Mark <Corrales.Mark@epa.gov>; Manibusan, Mary <Manibusan.Mary@epa.gov>; Muellerleile, Caryn <Muellerleile.Caryn@epa.gov>; Wiggins, Lanelle <Wiggins.Lanelle@epa.gov>; Kramer, Melissa <Kramer.Melissa@epa.gov>; Pritchard, Eileen <Pritchard.Eileen@epa.gov>; Adams, Darryl <Adams.Darryl@epa.gov>; Karen Sughrue <Sughrue.Karen@epamail.epa.gov>; Nurse, Leanne <Nurse.Leanne@epa.gov>; Rivera, Reiniero <Rivera.Reiniero@epa.gov>; Walker, Sherri <Walker.Sherri@epa.gov>; Brown, Stephanie N. <Brown.StephanieN@epa.gov>; Elman, Barry <Elman.Barry@epa.gov>  
**Subject:** OP Policy Review - OP Associate Administrator Notification (SAN 6715 - NPRM / OMB Review / Review #1 / OAR - 'Biogenic CO2 Rulemaking')

Approval for OMB Transmittal: NPRM - 'Biogenic CO2 Rulemaking'

OP Approval completed.

Link to Policy Review Document-> 

Message

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**From:** Carpenter, Thomas [Carpenter.Thomas@epa.gov]  
**Sent:** 4/12/2018 5:39:16 PM  
**To:** Brennan, Thomas [Brennan.Thomas@epa.gov]  
**Subject:** FW: your draft?  
**Attachments:** Outline SAB Report on Biogenic Carbon Questions. Draft. 2.25.2018.docx

Let's talk. Working with Jeanne on this

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**From:** Jeanne VanBriesen [mailto:jeanne@cmu.edu]  
**Sent:** Sunday, February 25, 2018 6:13 PM  
**To:** Carpenter, Thomas <Carpenter.Thomas@epa.gov>  
**Subject:** your draft?

Hi Tom:

I was waiting to see your draft, but I kept working on mine, of course.

Attached is a draft outline, with a proposed first and last chapter to wrap around the panel report. I also suggest modifying content in the panel report to link with these new chapters AND moving some of the novel analysis the panel completed to appendices. Until the front end is written, I wouldn't be able to be any more specific about how much of the main body of the panel's report I'd recommend modifying.

Also in this document (pg 2) is a short piece of writing that could be the preface to the working group charge and/or the introduction (chapter 2). The final paragraph is basically what I think the SAB must do to come to closure on this activity. However, that would represent a significant amount of work for a working group.

I've also begun some writing related to the new introduction, but I don't want to put more time into that until the SAB decides on a path forward.

I'm juggling a lot of meetings this week (as usual), but if you want to chat about this, I could be available between 1 and 3 on Wed the 28<sup>th</sup> or after 4 on Thursday the 1<sup>st</sup>.

jeanne

Jeanne M. VanBriesen, Ph.D., P.E.  
Duquesne Light Company Professor of Civil and Environmental Engineering and Engineering and Public Policy  
Director, Center for Water Quality in Urban Environmental Systems (Water QUEST)  
Chair, Faculty Organization  
Carnegie Mellon University  
[jeanne@cmu.edu](mailto:jeanne@cmu.edu)  
<http://www.ce.cmu.edu/~jeanne/>

## Appointment

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**From:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Sent:** 7/19/2017 11:00:35 PM  
**To:** Dominguez, Alexander [dominguez.alexander@epa.gov]; Fotouhi, David [fotouhi.david@epa.gov]; Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]; Kime, Robin [Kime.Robin@epa.gov]; Bolen, Brittany [bolen.brittany@epa.gov]; Letendre, Daisy [letendre.daisy@epa.gov]; Jones, Gail-R [Jones.Gail-R@epa.gov]; David M. (Max) Williamson [maxwilliamson@williamsonlawpolicy.com]; Kyle Harris [kharris@corn.org]; Keniece Barbee [kbarbee@corn.org]; jbode@corn.org; Rave, Norman (ENRD) [Norman.Rave@usdoj.gov]; Kolman, Chloe (ENRD) [Chloe.Kolman@usdoj.gov]  
**CC:** Schwab, Justin [schwab.justin@epa.gov]; Orlin, David [Orlin.David@epa.gov]; Doster, Brian [Doster.Brian@epa.gov]; Williams, Melina [Williams.Melina@epa.gov]; Greenglass, Nora [Greenglass.Nora@epa.gov]; Gunning, Paul [Gunning.Paul@epa.gov]; Birnbaum, Rona [Birnbaum.Rona@epa.gov]; Baptist, Erik [baptist.erik@epa.gov]  
**Subject:** Corn Refiners Association (re: biogenic CO2)  
**Attachments:** Biogenic CO2 Coalition Comments EPA Significance Rule (filed) (12-16-16)....pdf; Biogenic CO2 Coalition Slides (9-21-16).pdf; Biogenic CO2 Case Studies (4-14-16).pdf; Biogenic Letter to Administrator Pruitt.pdf; Biogenic CO2 Coalition Overview .pdf  
**Location:** 1200 Pennsylvania Avenue, NW (North) - Room 1332 WJCN  
**Start:** 7/26/2017 8:00:00 PM  
**End:** 7/26/2017 9:00:00 PM  
**Show Time As:** Tentative

Location: 1200 Pennsylvania Avenue, NW (North) - Room 1332WJCN

Directions: Please use the William Jefferson Clinton North Entrance located on your right as you exit the Federal Triangle Metro Station.

EPA Contact: For an escort from Security to the meeting call: **Ex. 6 Personal Privacy**

Request:  
Discuss biogenic CO2

Attendees:  
John Bode  
Kyle Harris  
David (Max) Williamson

Contact:  
Keniece Barbee  
Assistant to President and C.E.O.  
Corn Refiners Association

1701 Pennsylvania Avenue, N.W.  
Suite 950  
Washington, DC 20006  
Main: (202) 331-1634  
Direct: (202) 534-3491  
Fax: (202) 331-2054  
[www.corn.org](http://www.corn.org)

Message

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**From:** Ex. 6 Administrator  
**Sent:** 1/30/2019 12:55:44 PM  
**To:** Wehrum, Bill [Wehrum.Bill@epa.gov]  
**CC:** Lyons, Troy [lyons.troy@epa.gov]; Jackson, Ryan [jackson.ryan@epa.gov]  
**Subject:** RE: Wood Biomass

## Ex. 5 Deliberative Process (DP)

-----Original Message-----

**From:** Wehrum, Bill  
**Sent:** Wednesday, January 30, 2019 7:53 AM  
**To:** Ex. 6 Administrator  
**Cc:** Lyons, Troy <lyons.troy@epa.gov>; Jackson, Ryan <jackson.ryan@epa.gov>  
**Subject:** Re: Wood Biomass

I think we need to do this through rulemaking. An expeditious, but not crazy, schedule is to propose the third quarter of this year and finalize first quarter of 2020.

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Bill Wehrum  
Assistant Administrator  
Office of Air and Radiation  
U.S. Environmental Protection Agency  
(202) 564-7404

> On Jan 30, 2019, at 7:35 AM, Ex. 6 Administrator wrote:  
>  
> Guys, I said last week that I have to give Collins a timetable for action on wood biomass. My talking points are too vague. What is the timeline?  
>  
> Sent from my iPhone

Message

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**From:** Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]  
**Sent:** 4/21/2017 3:32:58 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** FW: Per my voicemail.....  
**Attachments:** biomass and permitting.docx

## Ex. 5 Deliberative Process (DP)

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**From:** Koerber, Mike  
**Sent:** Friday, April 21, 2017 9:47 AM  
**To:** Santiago, Juan <Santiago.Juan@epa.gov>  
**Cc:** Wood, Anna <Wood.Anna@epa.gov>; Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Subject:** Per my voicemail.....

## Ex. 5 Deliberative Process (DP)

Cheryl and Vera-

I was able to sit in on the corn refiners association which was rescheduled at the last minute to 3. It lasted until 3:07. John Bode was the principle speaker for CRA. Here are some of my notes:

- CRA has not seen the proposal but has heard from reporters that it doesn't address short cycle herbaceous crops.
- Anne responded that we took the view that based on the appropriations language and given the state of the science and broad spectrum of scientific discussion of what constitutes carbon neutrality that we wanted to be sure we didn't bite off more than we could chew. We wanted to take a step approach to make a rule as defensible as possible.
- CRA is disappointed since they hadn't heard this from EPA previously. They are also disappointed that the endangerment finding didn't address short cycle crops but that GHG reporting recognizes it as a sink.
- CRA questioned if that means there is no plan for addressing biogenic co2 from short cycle herbaceous crops except sometime further in the future. Anne agreed with this sentiment.
- CRA asked if we have heard from any other stakeholders and Anne said the more recent ones were only the general discussions pushing us to get something out to OMB. CRA wanted to confirm that nobody is lobbying against their position which Anne confirmed there is not.
- CRA again expressed their disappointment and stated that it sounded like congressional engagement is now part of the equation. It was not their approach as they were attempting to work directly with EPA but will now engage accordingly.

## Ex. 5 Deliberative Process (DP)

## **Ex. 5 Deliberative Process (DP)**



**From:** Mathias, Scott [Mathias.Scott@epa.gov]  
**Sent:** 1/23/2020 8:57:53 PM  
**To:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** RE: for your review: FY2021 budget hearing fact sheets

## Ex. 5 Deliberative Process (DP)

Scott Mathias | Acting Director, Air Quality Policy Division | U.S. EPA, RTP, NC 27711 | 919.541.5310

CONFIDENTIALITY. This email and any attachments are confidential, except where the email states it can be disclosed; it may also be covered by deliberative privilege. If received in error, please do not disclose the contents to anyone, but notify the sender by return email and delete this email and any attachments from your system.

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**From:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Sent:** Thursday, January 23, 2020 12:01 PM  
**To:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>  
**Subject:** for your review: FY2021 budget hearing fact sheets

I have reviewed the following:

## Ex. 5 Deliberative Process (DP)

Let me know if you have questions.  
Beth

---

**From:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Sent:** Tuesday, January 21, 2020 9:22 AM  
**To:** Svendsgaard, Dave <Svendsgaard.Dave@epa.gov>; Brachtel, Megan <Brachtel.Megan@epa.gov>; Palma, Elizabeth <Palma.Elizabeth@epa.gov>; Rao, Raj <Rao.Raj@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Cc:** Long, Pam <Long.Pam@epa.gov>  
**Subject:** ACTION: FY2021 budget hearing fact sheets (due 1/23 and 1/24)  
**Importance:** High

The EPA Administrator has FY2021 budget hearings coming up and OAR has asked us to create fact sheets for some of the major programs OAQPS is involved in. Please look at the attached spreadsheet and there are links to the previous pagers. Please update accordingly (track changes) as well as new information as needed. This request is a quick turnaround (see below); however, we need to ensure we get AQPD IO review beforehand so please plan accordingly.

*Some folks cannot access the files from the attached spreadsheet so I have copied the links below. Let me know if you have any issues.*

- Due Wednesday 2:00 (1/23)

## **Ex. 5 Deliberative Process (DP)**

- Biogenic CO2

- [https://usepa.sharepoint.com/:w:/s/OAQSPAC517/EfMDk\\_VA5ftGu4RIQENTXzsBRloCf690mZOIrjWuBrmxcA?e=bgvVuc](https://usepa.sharepoint.com/:w:/s/OAQSPAC517/EfMDk_VA5ftGu4RIQENTXzsBRloCf690mZOIrjWuBrmxcA?e=bgvVuc)

## **Ex. 5 Deliberative Process (DP)**

## **Ex. 5 Deliberative Process (DP)**

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Thank you,

***Yvonne W. Johnson***

Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921

[johnson.yvonne@epa.gov](mailto:johnson.yvonne@epa.gov)

**From:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]  
**Sent:** 1/23/2020 7:08:29 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**CC:** Mathias, Scott [Mathias.Scott@epa.gov]  
**Subject:** RE: for your review: FY2021 budget hearing fact sheets

## Ex. 5 Deliberative Process (DP)

Thank you,

*Yvonne W. Johnson*

Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
johnson.yvonnew@epa.gov

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**From:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Sent:** Thursday, January 23, 2020 1:30 PM  
**To:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Cc:** Mathias, Scott <Mathias.Scott@epa.gov>  
**Subject:** RE: for your review: FY2021 budget hearing fact sheets

## Ex. 5 Deliberative Process (DP)

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**From:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Sent:** Thursday, January 23, 2020 12:01 PM  
**To:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>  
**Subject:** for your review: FY2021 budget hearing fact sheets

## Ex. 5 Deliberative Process (DP)

**From:** Johnson, Yvonne W <[Johnson.YvonneW@epa.gov](mailto:Johnson.YvonneW@epa.gov)>

**Sent:** Tuesday, January 21, 2020 9:22 AM

**To:** Svendsgaard, Dave <[Svendsgaard.Dave@epa.gov](mailto:Svendsgaard.Dave@epa.gov)>; BrachtI, Megan <[BrachtI.Megan@epa.gov](mailto:BrachtI.Megan@epa.gov)>; Palma, Elizabeth <[Palma.Elizabeth@epa.gov](mailto:Palma.Elizabeth@epa.gov)>; Rao, Raj <[Rao.Raj@epa.gov](mailto:Rao.Raj@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Mathias, Scott <[Mathias.Scott@epa.gov](mailto:Mathias.Scott@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>

**Cc:** Long, Pam <[Long.Pam@epa.gov](mailto:Long.Pam@epa.gov)>

**Subject:** ACTION: FY2021 budget hearing fact sheets (due 1/23 and 1/24)

**Importance:** High

The EPA Administrator has FY2021 budget hearings coming up and OAR has asked us to create fact sheets for some of the major programs OAQPS is involved in. Please look at the attached spreadsheet and there are links to the previous pagers. Please update accordingly (track changes) as well as new information as needed. This request is a quick turnaround (see below); however, we need to ensure we get AQPD IO review beforehand so please plan accordingly.

*Some folks cannot access the files from the attached spreadsheet so I have copied the links below. Let me know if you have any issues.*

- Due Wednesday 2:00 (1/23)

## Ex. 5 Deliberative Process (DP)

- Biogenic CO2

- [https://usepa.sharepoint.com/:w:/s/OAQSPACS17/EfMDk\\_VA5ftGu4RIQENTXzsBRloCf690mZOirjWuBrmxcA?e=bgvVuc](https://usepa.sharepoint.com/:w:/s/OAQSPACS17/EfMDk_VA5ftGu4RIQENTXzsBRloCf690mZOirjWuBrmxcA?e=bgvVuc)

## Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

Thank you,

*Yvonne W. Johnson*

Special Assistant to the Director

Air Quality Policy Division

Office of Air Quality Planning & Standards

U.S. Environmental Protection Agency

919-541-3921

[johnson.yvonne@epa.gov](mailto:johnson.yvonne@epa.gov)

**From:** Brachtl, Megan [Brachtl.Megan@epa.gov]  
**Sent:** 1/21/2020 5:51:27 PM  
**To:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]; Svendsgaard, Dave [Svendsgaard.Dave@epa.gov]; Palma, Elizabeth [Palma.Elizabeth@epa.gov]; Rao, Raj [Rao.Raj@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Mathias, Scott [Mathias.Scott@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]  
**CC:** Long, Pam [Long.Pam@epa.gov]  
**Subject:** RE: CORRECTION - ACTION: FY2021 budget hearing fact sheets (due 1/23 and 1/28)

## Ex. 5 Deliberative Process (DP)

Thanks,  
Megan

Megan V. Brachtl, Group Leader  
State and Local Programs Group  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
(919) 541-2648  
brachtl.megan@epa.gov

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**From:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Sent:** Tuesday, January 21, 2020 12:36 PM  
**To:** Brachtl, Megan <Brachtl.Megan@epa.gov>; Svendsgaard, Dave <Svendsgaard.Dave@epa.gov>; Palma, Elizabeth <Palma.Elizabeth@epa.gov>; Rao, Raj <Rao.Raj@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Cc:** Long, Pam <Long.Pam@epa.gov>  
**Subject:** RE: CORRECTION - ACTION: FY2021 budget hearing fact sheets (due 1/23 and 1/28)

## Ex. 5 Deliberative Process (DP)

Thank you,

***Yvonne W. Johnson***  
Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921

[johnson.yvonnew@epa.gov](mailto:johnson.yvonnew@epa.gov)

---

**From:** BrachtI, Megan <[BrachtI.Megan@epa.gov](mailto:BrachtI.Megan@epa.gov)>

**Sent:** Tuesday, January 21, 2020 11:58 AM

**To:** Johnson, Yvonne W <[Johnson.Yvonnew@epa.gov](mailto:Johnson.Yvonnew@epa.gov)>; Svendsgaard, Dave <[Svendsgaard.Dave@epa.gov](mailto:Svendsgaard.Dave@epa.gov)>; Palma, Elizabeth <[Palma.Elizabeth@epa.gov](mailto:Palma.Elizabeth@epa.gov)>; Rao, Raj <[Rao.Raj@epa.gov](mailto:Rao.Raj@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Mathias, Scott <[Mathias.Scott@epa.gov](mailto:Mathias.Scott@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>

**Cc:** Long, Pam <[Long.Pam@epa.gov](mailto:Long.Pam@epa.gov)>

**Subject:** RE: CORRECTION - ACTION: FY2021 budget hearing fact sheets (due 1/23 and 1/28)

## Ex. 5 Deliberative Process (DP)

---

**From:** Johnson, Yvonne W <[Johnson.Yvonnew@epa.gov](mailto:Johnson.Yvonnew@epa.gov)>

**Sent:** Tuesday, January 21, 2020 11:41 AM

**To:** Svendsgaard, Dave <[Svendsgaard.Dave@epa.gov](mailto:Svendsgaard.Dave@epa.gov)>; BrachtI, Megan <[BrachtI.Megan@epa.gov](mailto:BrachtI.Megan@epa.gov)>; Palma, Elizabeth <[Palma.Elizabeth@epa.gov](mailto:Palma.Elizabeth@epa.gov)>; Rao, Raj <[Rao.Raj@epa.gov](mailto:Rao.Raj@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Mathias, Scott <[Mathias.Scott@epa.gov](mailto:Mathias.Scott@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>

**Cc:** Long, Pam <[Long.Pam@epa.gov](mailto:Long.Pam@epa.gov)>

**Subject:** CORRECTION - ACTION: FY2021 budget hearing fact sheets (due 1/23 and 1/28)

## Ex. 5 Deliberative Process (DP)

---

**From:** Johnson, Yvonne W

**Sent:** Tuesday, January 21, 2020 9:22 AM

**To:** Svendsgaard, Dave <[Svendsgaard.dave@epa.gov](mailto:Svendsgaard.dave@epa.gov)>; BrachtI, Megan <[BrachtI.Megan@epa.gov](mailto:BrachtI.Megan@epa.gov)>; Palma, Elizabeth <[Palma.Elizabeth@epa.gov](mailto:Palma.Elizabeth@epa.gov)>; Rao, Raj <[Rao.Raj@epa.gov](mailto:Rao.Raj@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Mathias, Scott <[Mathias.Scott@epa.gov](mailto:Mathias.Scott@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>

**Cc:** Long, Pam <[Long.Pam@epa.gov](mailto:Long.Pam@epa.gov)>

**Subject:** ACTION: FY2021 budget hearing fact sheets (due 1/23 and 1/24)

**Importance:** High

The EPA Administrator has FY2021 budget hearings coming up and OAR has asked us to create fact sheets for some of the major programs OAQPS is involved in. Please look at the attached spreadsheet and there are links to the previous pagers. Please update accordingly (track changes) as well as new information as needed. This request is a quick turnaround (see below); however, we need to ensure we get AQPD IO review beforehand so please plan accordingly.

*Some folks cannot access the files from the attached spreadsheet so I have copied the links below. Let me know if you have any issues.*

## Ex. 5 Deliberative Process (DP)

- Biogenic CO2

- [https://usepa.sharepoint.com/:w:/s/OAQSPACS17/EfMDk\\_VA5ftGu4RiQENTXzsBRloCf690mZOirjWu8rmxcA?e=bgvVuc](https://usepa.sharepoint.com/:w:/s/OAQSPACS17/EfMDk_VA5ftGu4RiQENTXzsBRloCf690mZOirjWu8rmxcA?e=bgvVuc)

## Ex. 5 Deliberative Process (DP)

- NSR

## Ex. 5 Deliberative Process (DP)

Thank you,

***Yvonne W. Johnson***

Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
[johnson.yvonne@epa.gov](mailto:johnson.yvonne@epa.gov)



Message

---

**From:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]  
**Sent:** 5/7/2019 3:07:52 PM  
**To:** Santiago, Juan [Santiago.Juan@epa.gov]; Mathias, Scott [Mathias.Scott@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** note the AFPA-AWC expanded agenda for meeting with Peter  
**Attachments:** AFPA-AWC expanded agenda for EPA 5-14-19.docx

AF&PA will be here on May 14. They are scheduled to talk to Peter. This is just a heads up in case Peter wants you to be there as well.

**2 to 3 PM Peter Tsirigotis (joined by Penny Lassiter?):**

- Priorities for AF&PA/AWC (25 minutes):
  1. PSD biomass
  2. NSR reforms
  3. PM NAAQS
  4. PCWP MACT/RTR
  5. Boiler MACT
- We understand that OAQPS will be taking a lead role in the interpretation of existing rules. How will that work?
- What are Peter's/OAQPS's priorities in 2019?
  - We understand that there are some personnel shifts happening in OAQPS as well as a new focus on outreach. Can you review these transitions and developments?
  - We hear that Henry Darwin is a big advocate for "LEAN" management across the Agency. Are there LEAN initiatives within OAQPS?

AF&PA/AWC – OAQPS Expanded Agenda  
May 14, 2019

**Room:** Building C-111C

**Conference line:** Ex. 6 Personal Privacy (PP)

**AF&PA/AWC attendees:** Jim Balik, Annabeth Reitter, Rich Garber, Ryan Gesser, Phil Ferguson, Rob Kaufmann, Steve Woock, Russell Strader, Mike Curtis, Vipin Varma, Corey Brandt, Glenn Rives, Will Telligman, Shannon Broome, Paul Noe, Tim Hunt; others will join by phone

**9 to 10 AM NAAQS Implementation Issues**

- **EPA attendees:** Scott Mathias, Megan Bracht, Michael Ling, Juan Santiago, Vera Kornylak
- Regional Haze (15 minutes)
  - What is the status and schedule of reconsideration of 2017 rule?
  - States have until 2021 for responding to second planning period but some are moving forward now. How will EPA address submittals given changing requirements? And when will it approve them (especially with policies changing)?
  - Does EPA expect most areas to be on the glide path in this second round (any East vs West differences)?
  - What is the role of FLM in this round? How can EPA balance their interests with others?
  - Any new guidance expected on regional haze (some was referenced in the Sept 2018 Roadmap)?
- International Transport/NAAQS Implementation: 4/4 Wayland-Wood memo (20 minutes)
  - Many upwind states have submitted Good Neighbor SIPs concluding no further controls in their states are needed to address downwind non-attainment areas. Are there any cross-cutting issues with these GNS that are problematic, such as modeling, reliance on exceptional events or international transport impacts?
  - As the Agency shifts to different base years for ozone (2014-16), what do you expect will happen with non-attainment designations (more, the same)?
  - Can you provide an update on EPA's response to NY's Section 126 petition?
  - How do you see the international transport policy shifts impacting future designations? How will the "but for" test work in marginal (or other) areas? If state declines to consider international transport, do they still get to seek upwind reductions?
  - Any implication of the denial of the Ozone Transport Region expansion by the court to EPA's review of pending GNS and 126 petitions?

- Exceptional Events (10 minutes)
  - How are states using the EE policy? Could additional states take advantage of the new approach (and if so, how is EPA helping with education)?
  - Does the agency plan further improvements to the policy so its easier to exclude fires and other EEs?
  - How is EPA responding to concerns of “overuse” of EE or transport?
- SSM SIP and policy (15 minutes)
  - The Reg 6 4/29 proposal contains a “narrowly tailored” affirmative defense provision for malfunctions and withdraws the SIP call for affirmative defense. What does the agency plan to do in other states including on issues beyond affirmative defense malfunctions in the SSM SIP Call?
  - Are there other state specific actions planned?

#### **10 to 11 AM NSR – white papers to be shared in advance on each topic**

- **EPA: Juan Santiago, Raj Rao, Cheryl Vetter, Scott Mathias**
- Netting Step II
- Limited Debottlenecking
- RMRR/ Functional Equivalent
- Ambient air policy – GP will present case study
- Status of other critical reforms, such as begin actual construction

#### **11 to 11:45 PSD Biomass rule**

- **Vera Kornylak, Cheryl Vetter, Raj Rao, Scott Mathias, OGC: Nora Greenglass and Sara Ohrel**
- Status/timing of stand-alone PSD rule
  - Rulemaking vs guidance
  - Focus on forest biomass?
  - Outstanding legal or scientific issues
  - Schedule
- Legal and policy rationale for stand-alone rule
  - AF&PA/AWC can describe what forest biomass materials should be covered by rule

#### **1 to 2 PM Modeling, Test Methods, and Emission Factors**

- **EPA attendees: Robin Segal, Nate Topham, James Hemby, Steph Johnson, George Bridgers, Tyler Fox and Marc Houyoux**
- CMS NSPS guidance – Reg 6 2017 letter to Oklahoma (Measurement Technology Group), Robin Segal aware of concerns (30 minutes)
  - Discuss issues and concerns with recently released (through ADI) memo:
    - “interpretation” inconsistent with the plain language of 60.13 and treatment of downtime

- Letter appears to change data availability requirements for valid CEMS hourly averages
- potentially triggers significant re-programming across all industry sectors
- MERPs guidance (15 minutes)
  - What changes are in the final guidance that you think are significant or important for us to understand?
  - Are you aware of any photo-chemical modeling done?
  - Did anything get discussed at the State-EPA meeting last week that concerns other planned modeling improvements?
- Paper Machine emission overestimates (15 minutes)
  - NCASI provided information to EPA on where paper machine values are relative to non-detects. What progress is possible on this issue?

**2 to 3 PM Peter Tsirigotis (joined by Penny Lassiter?):**

- Priorities for AF&PA/AWC (25 minutes):
  1. PSD biomass
  2. NSR reforms
  3. PM NAAQS
  4. PCWP MACT/RTR
  5. Boiler MACT
- We understand that OAQPS will be taking a lead role in the interpretation of existing rules. How will that work?
- What are Peter's/OAQPS's priorities in 2019?
  - We understand that there are some personnel shifts happening in OAQPS as well as a new focus on outreach. Can you review these transitions and developments?
  - We hear that Henry Darwin is a big advocate for "LEAN" management across the Agency. Are there LEAN initiatives within OAQPS?

**3 to 3:30 PM Boiler MACT (Jim Eddinger):**

- EPA provide update on schedule for rulemaking
- Review of likely existing and new source limits
- Need for 3-yr compliance period
- Discuss CO white paper provided by coalition
  - CO is a good surrogate for non-dioxin organic HAPs
  - Best performing boilers do not use control technologies that reduce organic HAPs beyond what achieved by regulating CO alone
  - 130 ppm CO cutoff is supported by EPA's data that reductions below 130 do not result in greater reductions of organic HAPs.
- Economic impacts are modest based on our assessment, has EPA started analysis?

Message

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**From:** Bradfield, John [Bradfield.John@epa.gov]  
**Sent:** 10/30/2018 2:17:52 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** RE: Inquiry from AF&PA

10-4. Your call on when (and if) you meet with Tim's group. I won't respond to his email; but he may call me, too. Again, presently, the meetings we have set up are Kristen Benedict, on sensors, from 9-10 and Anna Wood & co. from 10-11. Yvonne would be able to say if those times can move around, but 11-1 is still available.

Right now we are in E201. I am working on trying to free up a room. OARM has locked up all of 111 and 113 all day for a 'holiday' function. Between us, that sounds like a bit much. If I can sweet talk them out of 113 for a couple hours, we will move the meeting to C.

John Bradfield  
Environmental Engineer  
U.S. EPA | Natural Resources Group | Sector Policies and Programs Division, OAQPS  
109 T.W. Alexander Drive (Mail Drop E143-03) | Research Triangle Park, NC 27711  
Phone: 919.541.3062 | email: [Bradfield.John@epa.gov](mailto:Bradfield.John@epa.gov)

---

**From:** Kornylak, Vera S.  
**Sent:** Tuesday, October 30, 2018 8:42 AM  
**To:** Bradfield, John <Bradfield.John@epa.gov>  
**Subject:** Inquiry from AF&PA

Good morning John, just a heads up that I'm talking with Anna about AF&PA (Tim Hunt's) request to have a 2 hour meeting with us on biomass related issues. So please hold off if possible in responding to his latest email. Also, we can make arrangements through Yvonne as well so I don't want you to feel obligated to find rooms for us etc...

Thanks!  
Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Wood, Anna [Wood.Ann@epa.gov]  
**Sent:** 10/30/2018 11:28:47 AM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** Re: Dec 13

## Ex. 5 Deliberative Process (DP)

On Oct 29, 2018, at 8:10 PM, Kornylak, Vera S. <Kornylak.Vera@epa.gov> wrote:

## Ex. 5 Deliberative Process (DP)

Vera

Vera Kornylak  
OAQPS/AQPD  
919-541-4067  
[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

On Oct 29, 2018, at 5:55 PM, Wood, Anna <Wood.Ann@epa.gov> wrote:

## Ex. 5 Deliberative Process (DP)

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**From:** Kornylak, Vera S.  
**Sent:** Monday, October 29, 2018 5:52 PM  
**To:** Wood, Anna <Wood.Ann@epa.gov>  
**Subject:** Fwd: Dec 13

## Ex. 5 Deliberative Process (DP)

Vera Kornylak  
OAQPS/AQPD  
919-541-4067  
[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

Begin forwarded message:

**From:** "Hunt, Tim" <Tim\_Hunt@afandpa.org>  
**Date:** October 29, 2018 at 5:26:01 PM EDT  
**To:** "Bradfield.John@epa.gov" <Bradfield.John@epa.gov>  
**Cc:** Vera Kornylak <Kornylak.vera@epa.gov>  
**Subject:** Dec 13

John, we are planning to meet with Vera Kornylak from 11 to 1 on the 13th. I know you've struggled with room spaces that day for our other meetings, any chance of finding something that fits us all? The topic is biomass rule making. Thanks.

Message

---

**From:** Hunt, Tim [Tim\_Hunt@afandpa.org]  
**Sent:** 10/29/2018 2:34:03 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** Re: Nov 13 meeting

Excellent. I've got calls at 11, noon and 1:30 today and then head to the airport at 2:30 so email may be best to confirm timing but voicemail works as well.

Tim Hunt  
Sent from my iPhone

On Oct 29, 2018, at 10:16 AM, Kornylak, Vera S. <Kornylak.Vera@epa.gov> wrote:

Hi Tim, thanks for your message and voicemail. I will give you a call later today - the 13th is tight and I was checking on a couple scheduling issues before getting back to you. That said, I appreciate your urgency and I will reach out to you later this morning.

Vera

Vera Kornylak  
OAQPS/AQPD  
919-541-4067  
[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

On Oct 29, 2018, at 9:57 AM, Hunt, Tim <Tim\_Hunt@afandpa.org> wrote:

Vera,

I left a message last week whether you and others would be available to meet with me, Paul Noe, and our outside counsel on your efforts to draft a proposed rule on biomass in the context of PSD. Paul and I might be down in RTP that day anyway so it would be very convenient. This is important work you are doing so there is some urgency as well.

Let me know what works. Thanks,

Timothy Hunt  
Senior Director, Air Quality Programs  
AMERICAN FOREST & PAPER ASSOCIATION  
1101 K Street, N.W., Suite 700, Washington, D.C. 20005  
[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)  
202-463-2588  
[www.afandpa.org](http://www.afandpa.org)



<image002.jpg> <image003.jpg><image004.jpg><image005.jpg><image006.jpg>

Message

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**From:** Hunt, Tim [Tim\_Hunt@afandpa.org]  
**Sent:** 10/29/2018 1:56:46 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**CC:** Santiago, Juan [Santiago.Juan@epa.gov]  
**Subject:** Nov 13 meeting  
**Attachments:** ATT00001.txt

Vera,

I left a message last week whether you and others would be available to meet with me, Paul Noe, and our outside counsel on your efforts to draft a proposed rule on biomass in the context of PSD. Paul and I might be down in RTP that day anyway so it would be very convenient. This is important work you are doing so there is some urgency as well.

Let me know what works. Thanks,

Timothy Hunt  
Senior Director, Air Quality Programs  
AMERICAN FOREST & PAPER ASSOCIATION  
1101 K Street, N.W., Suite 700, Washington, D.C. 20005  
[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)  
202-463-2588  
[www.afandpa.org](http://www.afandpa.org)





Message

---

**From:** Ling, Michael [Ling.Michael@epa.gov]  
**Sent:** 2/7/2019 11:08:57 PM  
**To:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]  
**CC:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** FW: ACTION: AQPD projects and projected signature dates (COB 2/28)  
**Attachments:** Copy of OAQPS Tracker Report\_RHGuidance.xlsx

## Ex. 5 Deliberative Process (DP)

Michael Ling  
Group Leader (Acting)  
Geographic Strategies Group  
Air Quality Policy Division  
U.S. EPA - OAQPS  
(919) 541-4729

---

**From:** Beaver, Melinda  
**Sent:** Wednesday, February 06, 2019 11:45 AM  
**To:** Ling, Michael <Ling.Michael@epa.gov>  
**Cc:** Werner, Christopher <Werner.Christopher@epa.gov>  
**Subject:** RE: ACTION: AQPD projects and projected signature dates (COB 2/28)

## Ex. 5 Deliberative Process (DP)

Thanks,  
Melinda

---

**From:** Ling, Michael  
**Sent:** Tuesday, February 05, 2019 1:13 PM

**To:** OAQPS AQPD GSG <[OAQPS\\_AQPD\\_GSG@epa.gov](mailto:OAQPS_AQPD_GSG@epa.gov)>

**Subject:** FW: ACTION: AQPD projects and projected signature dates (COB 2/28)

**Importance:** High

## Ex. 5 Deliberative Process (DP)

Michael Ling  
Group Leader (Acting)  
Geographic Strategies Group  
Air Quality Policy Division  
U.S. EPA - OAQPS  
(919) 541-4729

**From:** Johnson, Yvonne W

**Sent:** Tuesday, February 05, 2019 12:08 PM

**To:** Brachtel, Megan <[Brachtel.Megan@epa.gov](mailto:Brachtel.Megan@epa.gov)>; Ling, Michael <[Ling.Michael@epa.gov](mailto:Ling.Michael@epa.gov)>; Rao, Raj <[Rao.Raj@epa.gov](mailto:Rao.Raj@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>

**Cc:** Wood, Anna <[Wood.Anna@epa.gov](mailto:Wood.Anna@epa.gov)>; Kuhn, Keith <[kuhn.keith@epa.gov](mailto:kuhn.keith@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Mathias, Scott <[Mathias.Scott@epa.gov](mailto:Mathias.Scott@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>

**Subject:** ACTION: AQPD projects and projected signature dates (COB 2/28)

**Importance:** High

Attached is a copy of the OAQPS Project Tracker reflecting only AQPD projects. I have highlighted in yellow the signature date column. Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

Thank you,

***Yvonne W. Johnson***

Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
[johnson.yvonnew@epa.gov](mailto:johnson.yvonnew@epa.gov)

## OAQPS Tracker Report

OMB Determination Status Key

Deadline Type Key

NS-C: Non-significant Confirmed, NS-R: Non-significant Requested, NS-P: Non-Significant to be Requested, \$S: Economically Significant, S: Significant, E: Exempt

C/D: Consent Decree, C/O: Court Order, C/P: Court Promise, S/A: Settlement Agreement, Stat: Statutory

| Div                             | SAN | Action Title | T | Stage | Signer | OMB Det | Date Det Confirmed | To OAR | ✓ | To OP | ✓ | To OMB | ✓ | Cleared OMB | Sig Date | Deadline Type | Background Information |
|---------------------------------|-----|--------------|---|-------|--------|---------|--------------------|--------|---|-------|---|--------|---|-------------|----------|---------------|------------------------|
| Ex. 5 Deliberative Process (DP) |     |              |   |       |        |         |                    |        |   |       |   |        |   |             |          |               |                        |
| Ex. 5 Deliberative Process (DP) |     |              |   |       |        |         |                    |        |   |       |   |        |   |             |          |               |                        |

## **Ex. 5 Deliberative Process (DP)**

## Ex. 5 Deliberative Process (DP)

|      |      |   |   |      |       |   |                                 |  |  |  |  |
|------|------|---|---|------|-------|---|---------------------------------|--|--|--|--|
| AQPD | 6715 | Treatment of Biogenic CO2 Emissions under the Clean Air Act Permitting Programs | 1 | NPRM | Admin | S | Ex. 5 Deliberative Process (DP) |  |  |  | This proposed action will establish regulatory provisions for the treatment (exemption) of certain biogenic carbon dioxide (CO2) emissions from stationary sources under the Prevention of Significant Deterioration (PSD) and Title V permitting programs. The proposed regulatory action will be based on the Agency's policy regarding the treatment of biogenic CO2 emissions under the Clean Air Act. |
|------|------|---|---|------|-------|---|---------------------------------|--|--|--|--|

# Ex. 5 Deliberative Process (DP)

## OAQPS Tracker Report - Events, Reports, and Other Developments

| Type | Title | Date | Location | Background |
|------|-------|------|----------|------------|
|------|-------|------|----------|------------|

# Ex. 5 Deliberative Process (DP)

## **Ex. 5 Deliberative Process (DP)**

## **Ex. 5 Deliberative Process (DP)**



## **Ex. 5 Deliberative Process (DP)**

## **Ex. 5 Deliberative Process (DP)**



Message

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**From:** Wood, Anna [Wood.Ann@epa.gov]  
**Sent:** 10/26/2018 1:15:31 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** Re: biomass reminder

No worries- just wanted to make sure you did not get multiple inquiries!

Sent from my iPhone

On Oct 26, 2018, at 9:13 AM, Kornylak, Vera S. <Kornylak.Vera@epa.gov> wrote:

Tim Hunt called me about having him, Paul Noe, and Russ Frye (their attorney) come meeting with us. I think I said yesterday it was Paul who called but actually it was Tim (I made a mistake).

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Wood, Anna  
**Sent:** Friday, October 26, 2018 9:13 AM  
**To:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Subject:** Re: biomass reminder

Got it- I will talk with Peter about it in my 1 on 1 this morning. Thx

Was it Tim Hunt or Paul Noe? Thx

Sent from my iPhone

On Oct 26, 2018, at 9:09 AM, Kornylak, Vera S. <Kornylak.Vera@epa.gov> wrote:

Hi Anna, just a reminder that I have a voicemail from Tim Hunt to return requesting a 3-4 hour "roll-up the sleeves" working session on biomass on 11/13. As you know, we

## Ex. 5 Deliberative Process (DP)

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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Message

---

**From:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Sent:** 8/27/2018 7:42:35 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** Meeting Request for Peter T. - Biogenic CO2  
**Attachments:** PETER T. MEETING REQUEST\_BiogenicCO2Emissions\_08272018.docx

**Flag:** Flag for follow up

Vera,

Here is the meeting request for Peter T. for the biogenic CO2 early guidance pre-brief. Let me know if you approve it so I can forward it to Lana for scheduling.

Thanks,

Jessica

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407  
Note: Positions or views expressed here do not represent official EPA policy.

Looking for a speaker for your school or community event? <http://www.epa.gov/rtpspeakings/>

---

**From:** Kornylak, Vera S.  
**Sent:** Monday, August 27, 2018 3:04 PM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>  
**Subject:** BiogenicCO2EmissionsInAirPermittingOptionsPaper\_08242018+WG Feedback 8 27 18.docx

Message

---

**From:** South, Peter [South.Peter@epa.gov]  
**Sent:** 9/18/2018 7:25:26 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** RE: Biogenic CO2 paper for Wed

Great—thanks.

---

**From:** Kornylak, Vera S.  
**Sent:** Tuesday, September 18, 2018 3:20 PM  
**To:** South, Peter <South.Peter@epa.gov>  
**Cc:** Wood, Anna <Wood.Anna@epa.gov>; Long, Pam <Long.Pam@epa.gov>; Montanez, Jessica <Montanez.Jessica@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** RE: Biogenic CO2 paper for Wed

Pete, this looks fine, thanks. I fixed what looked like one typo.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** South, Peter  
**Sent:** Tuesday, September 18, 2018 2:54 PM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Cc:** Wood, Anna <[Wood.Anna@epa.gov](mailto:Wood.Anna@epa.gov)>; Long, Pam <[Long.Pam@epa.gov](mailto:Long.Pam@epa.gov)>; Montanez, Jessica <[Montanez.Jessica@epa.gov](mailto:Montanez.Jessica@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>  
**Subject:** RE: Biogenic CO2 paper for Wed

Hi Vera,  
Mostly minor edits—see redline/strikeout.

Thanks and feel free to call me with any questions.

---

**From:** Kornylak, Vera S.  
**Sent:** Monday, September 17, 2018 4:38 PM  
**To:** South, Peter <[South.Peter@epa.gov](mailto:South.Peter@epa.gov)>  
**Cc:** Wood, Anna <[Wood.Anna@epa.gov](mailto:Wood.Anna@epa.gov)>; Long, Pam <[Long.Pam@epa.gov](mailto:Long.Pam@epa.gov)>; Montanez, Jessica <[Montanez.Jessica@epa.gov](mailto:Montanez.Jessica@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>  
**Subject:** Biogenic CO2 paper for Wed

Hi Pete: here's the paper we intend to use with Bill on Wednesday to talk biogenic CO2. Note I didn't add the date in on here ...

Thanks,  
Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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Message

---

**From:** Baker, Sarah [baker.sarah@epa.gov]  
**Sent:** 2/27/2019 3:05:32 PM  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**CC:** Spangler, Matthew [Spangler.Matthew@epa.gov]  
**Subject:** Biogenic CO2 Draft Administrator Document  
**Attachments:** Biogenic Administrator Briefing Document.docx; BiogenicCO2PermittingRulemakingSchedule\_02262019.docx

**Flag:** Follow up

Attached is a draft briefing paper to help start our discussion of what information we want to convey to the Administrator. A

**Ex. 5 Deliberative Process (DP)**

## **Ex. 5 Deliberative Process (DP)**

Sarah Baker  
Environmental Protection Specialist  
Air Quality Policy Division, Operating Permits Group  
U.S. EPA, Office of Air Quality Planning and Standards  
(919) 541-4846 / [baker.sarah@epa.gov](mailto:baker.sarah@epa.gov)

Message

---

**From:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Sent:** 2/7/2019 7:44:49 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Baker, Sarah [baker.sarah@epa.gov]; Spangler, Matthew [Spangler.Matthew@epa.gov]  
**Subject:** RE: biomass check in

**Ex. 5 Deliberative Process (DP)**

Cheryl Vetter  
U.S. Environmental Protection Agency  
OAQPS/AQPD/OPG (C504-03)  
Research Triangle Park, NC 27711  
Phone (919) 541-4391 Fax (919) 541-5509  
Note: Positions or views expressed here do not represent official EPA policy.

---

**From:** Kornylak, Vera S.  
**Sent:** Thursday, February 07, 2019 2:14 PM  
**To:** Baker, Sarah <baker.sarah@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Spangler, Matthew <Spangler.Matthew@epa.gov>  
**Subject:** RE: biomass check in

# Ex. 5 Deliberative Process (DP)

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Baker, Sarah  
**Sent:** Thursday, February 07, 2019 2:02 PM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Spangler, Matthew <[Spangler.Matthew@epa.gov](mailto:Spangler.Matthew@epa.gov)>  
**Subject:** RE: biomass check in

# Ex. 5 Deliberative Process (DP)

I believe you are correct that we discussed attaching the early guidance paper for additional information. I've attached what Jessica sent to me. Is this the correct document?

Sarah

---

**From:** Kornylak, Vera S.

**Sent:** Thursday, February 07, 2019 10:30 AM

**To:** Baker, Sarah <baker.sarah@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Spangler, Matthew <Spangler.Matthew@epa.gov>

**Subject:** RE: biomass check in

Thanks Sarah. I think the paper looks fine to me, I have no feedback. If I remember correctly, we were going to also forward along with this, the previously used draft early guidance paper (just to refresh Peter/Bill recollections on the regulatory approaches). Is that still our thinking?

## Ex. 5 Deliberative Process (DP)

Thanks,  
Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Baker, Sarah

**Sent:** Thursday, February 07, 2019 9:50 AM

**To:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Spangler, Matthew <Spangler.Matthew@epa.gov>

**Subject:** RE: biomass check in

Vera-

### Ex. 5 Deliberative Process (DP)

be able to touch base with her today or she said she is in the office tomorrow. I've attached the briefing paper. Just let me know if there is anything else you want to discuss. Thanks!

Sarah

---

**From:** Kornylak, Vera S.

**Sent:** Wednesday, February 06, 2019 4:01 PM

**To:** Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Baker, Sarah <baker.sarah@epa.gov>; Spangler, Matthew <Spangler.Matthew@epa.gov>

**Subject:** biomass check in

Hi, just wanted to check in on how biomass is going – is the paper coming along, have the outreach conversations gone well? At some point let me know if we're still on target for next week's briefing (2/13)?

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Wood, Anna [Wood.Ann@epa.gov]  
**Sent:** 10/17/2018 9:58:43 PM  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** RE: Ag Biogenic CO2

## Ex. 5 Deliberative Process (DP)

**From:** Vetter, Cheryl  
**Sent:** Wednesday, October 17, 2018 5:11 PM  
**To:** Wood, Anna <Wood.Ann@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Subject:** RE: Ag Biogenic CO2

## Ex. 5 Deliberative Process (DP)

**From:** Wood, Anna  
**Sent:** Wednesday, October 17, 2018 5:01 PM  
**To:** Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Subject:** Fwd: Ag Biogenic CO2

# Ex. 5 Deliberative Process (DP)

**From:** Kyle Harris <kharris@corn.org>  
**Date:** October 17, 2018 at 4:09:58 PM EDT  
**To:** "Wood, Anna" <Wood.Ann@epa.gov>  
**Subject:** RE: Ag Biogenic CO2

Hi Anna,

It seems as if "Treatment of Biogenic CO2 Emissions Under the Clean Air Act Permitting Programs" that was on the Spring 2018 Reg Agenda (as a long term action) is no longer present on the Fall 2018 Agenda.... I was wondering if you could elaborate on this.... Would it be combined into another proposed rulemaking that is on the Fall Agenda? Am I missing something?

Just hoping you could elaborate on this.

Best,

Kyle

**Kyle A. Harris**  
Director, Environmental Affairs/Workplace Safety

**Corn Refiners Association**  
1701 Pennsylvania Avenue, N.W.  
Suite 400  
Washington, D.C. 20006  
Office: 202-534-3501  
Cell: 410-924-2629

---

**From:** Wood, Anna <[Wood.Ann@epa.gov](mailto:Wood.Ann@epa.gov)>  
**Sent:** Tuesday, October 09, 2018 9:40 AM  
**To:** Kyle Harris <[kharris@corn.org](mailto:kharris@corn.org)>  
**Cc:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Subject:** Re: Ag Biogenic CO2

Thanks Kyle, appreciate the follow-up- nothing to update at this time. Thanks for reaching out. Anna

Sent from my iPhone

On Oct 9, 2018, at 9:21 AM, Kyle Harris <[kharris@corn.org](mailto:kharris@corn.org)> wrote:

Hi Anna,

As we approach mid October I wanted to reach out and see if there are any updates on Biogenic CO2.

Best,

Kyle

**Kyle A. Harris**

Director, Environmental Affairs & Workplace Safety

image003.png>

**CORN REFINERS ASSOCIATION**  
1701 Pennsylvania Avenue, NW, Suite 400  
Washington, DC 20006-5806  
O (202) 534-3501  
C (410) 924-2629  
**CORN.ORG**

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<image004.gif>

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**From:** Wood, Anna <[Wood.Ann@epa.gov](mailto:Wood.Ann@epa.gov)>  
**Sent:** Wednesday, September 12, 2018 2:01 PM  
**To:** Kyle Harris <[kharris@corn.org](mailto:kharris@corn.org)>  
**Cc:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Subject:** RE: Ag Biogenic CO2

Hi Kyle, my apologies for the delay in getting back to you. Thank you for reaching out on biogenic CO2 and appreciate your offer. At this point we are working to provide the senior OAR managers with a briefing on potential paths to address biogenic CO2. Please feel free to follow up in mid-October as I am hopeful that we will have more insight on

the path forward on this important subject. Hope this email finds you well and thanks again for reaching out, Anna

---

**From:** Kyle Harris [<mailto:kharris@corn.org>]  
**Sent:** Monday, September 10, 2018 8:37 AM  
**To:** Wood, Anna  
**Subject:** Ag Biogenic CO2

Ms. Wood,

My name is Kyle Harris, I am Director of Environmental Affairs for the Corn Refiners Association, who run the Biogenic CO2 Coalition (the ag component of the larger Biomass discussion). Its been a little over a month since our meeting with Mandy and David (I believe you were on the phone) at EPA headquarters and I wanted to follow up with you to see if there was any updates with regard to the regulation of Biogenic CO2. We want to be as helpful as possible/appropriate and would love to set up a call (or come down to RTP) to further discuss.

Best Regards,

Kyle

---

Kyle A. Harris  
*Director, Environmental Affairs/ Workplace Safety*  
Corn Refiners Association  
[www.corn.org](http://www.corn.org)  
1701 Pennsylvania Ave NW  
Suite 400, Washington, DC 20006  
Office: (202) 534-3501  
Cell: (410) 924-2629

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<image

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<image004.gif>

Message

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**From:** Wood, Anna [Wood.Ann@epa.gov]  
**Sent:** 5/7/2018 9:17:49 PM  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]; Brachtl, Megan [Brachtl.Megan@epa.gov]; Jones, Rhea [Jones.Rhea@epa.gov]; Rao, Raj [Rao.Raj@epa.gov]  
**CC:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Ling, Michael [Ling.Michael@epa.gov]; Mathias, Scott [Mathias.Scott@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]  
**Subject:** RE: AF&PA to be here at RTP Wednesday. would you like staff to attend?

I am fine with it if we can make it work--thx

---

**From:** Vetter, Cheryl  
**Sent:** Monday, May 07, 2018 5:05 PM  
**To:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>; Brachtl, Megan <Brachtl.Megan@epa.gov>; Jones, Rhea <Jones.Rhea@epa.gov>; Rao, Raj <Rao.Raj@epa.gov>  
**Cc:** Wood, Anna <Wood.Ann@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Ling, Michael <Ling.Michael@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** RE: AF&PA to be here at RTP Wednesday. would you like staff to attend?

Any chance we could switch the order? Raj and I (and our key staff people) will be on the APM call starting at 2. There is a good chance that we could be done by 3.

Cheryl Vetter  
U.S. Environmental Protection Agency  
OAQPS/AQPD/OPG (C504-03)  
Research Triangle Park, NC 27711  
Phone (919) 541-4391 Fax (919) 541-5509  
Note: Positions or views expressed here do not represent official EPA policy.

---

**From:** Johnson, Yvonne W  
**Sent:** Monday, May 07, 2018 3:52 PM  
**To:** Brachtl, Megan <Brachtl.Megan@epa.gov>; Jones, Rhea <Jones.Rhea@epa.gov>; Rao, Raj <Rao.Raj@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>  
**Cc:** Wood, Anna <Wood.Ann@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Ling, Michael <Ling.Michael@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** AF&PA to be here at RTP Wednesday. would you like staff to attend?

AF&PA will be here on Wednesday. Currently, it is shown on the calendars of those noted below. GLs, if you would like someone from your staff to attend in your place or along with you please let me know.

**2 to 4 PM Meet with AQPD & AQAD**

- **2:00 – 3:00 (invited Anna, Juan, Raj, Cheryl)**
  - Biomass rulemaking – schedule, scope, rationale
  - NSR/PSD Improvements – ambient air, project aggregation, RMRR, PALs, others
  - SSM SIP Call
- **3:00 – 4:00 (invited Anna, Michael, Scott, Vera, Megan, Rhea)**
  - NAAQS implementation improvements – international transport, 126 petitions, non-attainment designations for ozone, offset policies, other issues from 4/12 Presidential memo



- Regional Haze
- Any other issues identified by EPA or AF&PA/AWC

---


Thank you,

***Yvonne W. Johnson***

Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
[johnson.yvonne@epa.gov](mailto:johnson.yvonne@epa.gov)

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**REG 12411** **REG 12411-01**

**Title:** **Consent of Support 102 Exemptions Under the Clean Air Act Permitting Program**

**Status:**

This consent is an administrative regulatory procedure to the between signatories of certain historic consent document (CSD) exemption from statutory source under the **Permitting of Significant Deterioration (PSD)** and **State Air Permitting** programs. The project regulatory action will be based on the agency's policy regarding the consent of support 102 exemption activities. **Consent of Support**

**Agency:** **Environmental Protection Agency (EPA)**

**Sub-Topic:** **Permitting**

**Agency:** **Environmental Protection Agency**

**101/102/103/104/105/106/107/108/109/110/111/112/113/114/115/116/117/118/119/120/121/122/123/124/125/126/127/128/129/130/131/132/133/134/135/136/137/138/139/140/141/142/143/144/145/146/147/148/149/150/151/152/153/154/155/156/157/158/159/160/161/162/163/164/165/166/167/168/169/170/171/172/173/174/175/176/177/178/179/180/181/182/183/184/185/186/187/188/189/190/191/192/193/194/195/196/197/198/199/200/201/202/203/204/205/206/207/208/209/210/211/212/213/214/215/216/217/218/219/220/221/222/223/224/225/226/227/228/229/230/231/232/233/234/235/236/237/238/239/240/241/242/243/244/245/246/247/248/249/250/251/252/253/254/255/256/257/258/259/260/261/262/263/264/265/266/267/268/269/270/271/272/273/274/275/276/277/278/279/280/281/282/283/284/285/286/287/288/289/290/291/292/293/294/295/296/297/298/299/300/301/302/303/304/305/306/307/308/309/310/311/312/313/314/315/316/317/318/319/320/321/322/323/324/325/326/327/328/329/330/331/332/333/334/335/336/337/338/339/340/341/342/343/344/345/346/347/348/349/350/351/352/353/354/355/356/357/358/359/360/361/362/363/364/365/366/367/368/369/370/371/372/373/374/375/376/377/378/379/380/381/382/383/384/385/386/387/388/389/390/391/392/393/394/395/396/397/398/399/400/401/402/403/404/405/406/407/408/409/410/411/412/413/414/415/416/417/418/419/420/421/422/423/424/425/426/427/428/429/430/431/432/433/434/435/436/437/438/439/440/441/442/443/444/445/446/447/448/449/450/451/452/453/454/455/456/457/458/459/460/461/462/463/464/465/466/467/468/469/470/471/472/473/474/475/476/477/478/479/480/481/482/483/484/485/486/487/488/489/490/491/492/493/494/495/496/497/498/499/500/501/502/503/504/505/506/507/508/509/510/511/512/513/514/515/516/517/518/519/520/521/522/523/524/525/526/527/528/529/530/531/532/533/534/535/536/537/538/539/540/541/542/543/544/545/546/547/548/549/550/551/552/553/554/555/556/557/558/559/560/561/562/563/564/565/566/567/568/569/570/571/572/573/574/575/576/577/578/579/580/581/582/583/584/585/586/587/588/589/590/591/592/593/594/595/596/597/598/599/600/601/602/603/604/605/606/607/608/609/610/611/612/613/614/615/616/617/618/619/620/621/622/623/624/625/626/627/628/629/630/631/632/633/634/635/636/637/638/639/640/641/642/643/644/645/646/647/648/649/650/651/652/653/654/655/656/657/658/659/660/661/662/663/664/665/666/667/668/669/670/671/672/673/674/675/676/677/678/679/680/681/682/683/684/685/686/687/688/689/690/691/692/693/694/695/696/697/698/699/700/701/702/703/704/705/706/707/708/709/710/711/712/713/714/715/716/717/718/719/720/721/722/723/724/725/726/727/728/729/730/731/732/733/734/735/736/737/738/739/740/741/742/743/744/745/746/747/748/749/750/751/752/753/754/755/756/757/758/759/760/761/762/763/764/765/766/767/768/769/770/771/772/773/774/775/776/777/778/779/780/781/782/783/784/785/786/787/788/789/790/791/792/793/794/795/796/797/798/799/800/801/802/803/804/805/806/807/808/809/810/811/812/813/814/815/816/817/818/819/820/821/822/823/824/825/826/827/828/829/830/831/832/833/834/835/836/837/838/839/840/841/842/843/844/845/846/847/848/849/850/851/852/853/854/855/856/857/858/859/860/861/862/863/864/865/866/867/868/869/870/871/872/873/874/875/876/877/878/879/880/881/882/883/884/885/886/887/888/889/890/891/892/893/894/895/896/897/898/899/900/901/902/903/904/905/906/907/908/909/910/911/912/913/914/915/916/917/918/919/920/921/922/923/924/925/926/927/928/929/930/931/932/933/934/935/936/937/938/939/940/941/942/943/944/945/946/947/948/949/950/951/952/953/954/955/956/957/958/959/960/961/962/963/964/965/966/967/968/**

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---

**From:** Long, Pam  
**Sent:** Tuesday, August 21, 2018 10:56 AM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Subject:** This is what the Fall Agenda will show in the proposal section - Biomass - the 12/00/19 date reflects publication

## 128. TREATMENT OF BIOGENIC CO2 EMISSIONS UNDER THE CLEAN AIR ACT PERMITTING PROGRAMS

**Priority:** Other Significant. Major status under 5 USC 801 is undetermined.

**EO 13771 Designation:** Other

**Legal Authority:** Not Yet Determined

**CFR Citation:** TBD

**Legal Deadline:** None.

**Abstract:** This proposed action will establish the treatment of biogenic carbon dioxide (CO2) emissions from the use of certain biomass feedstocks at stationary sources under the Prevention of Significant Deterioration (PSD) and Title V permitting programs. The proposed action will be based on the Agency's policy regarding the treatment of biogenic CO2 emissions under the Clean Air Act.

**Timetable:**

| Action | Date     | FR Cite |
|--------|----------|---------|
| NPRM   | 12/00/19 |         |

**Regulatory Flexibility Analysis Required:** Undetermined

**Government Levels Affected:** Federal, State, Local, Tribal

**Agency Contact:** Jessica Montanez, Environmental Protection Agency, Office of Air and Radiation, C504-03, Research Triangle Park, NC 27711

Phone: 919 541-3407

Fax: 919 541-5509

Email: [montanez.jessica@epa.gov](mailto:montanez.jessica@epa.gov)

Cheryl Vetter, Environmental Protection Agency, Office of Air and Radiation, C504-03, Research Triangle Park, NC  
27711

Phone: 919 541-4391

Fax: 919 541-5509

Email: [vetter.cheryl@epa.gov](mailto:vetter.cheryl@epa.gov)

**RIN:** 2060-AU03

Message

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**From:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Sent:** 9/27/2018 2:55:31 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** Fw: Summary of SAB meeting

FYI...

Jessica Montanez | US Environmental Protection Agency | Office of Air Quality Planning and Standards | 109 TW Alexander Drive MD: C504-03 RTP, NC 27711 | Phone: 919-541-3407 | Fax: 919-541-5509

---

**From:** Steller, John  
**Sent:** Thursday, September 27, 2018 10:37 AM  
**To:** Greenglass, Nora; Montanez, Jessica; Williams, Melina  
**Cc:** Ohrel, Sara; Sarofim, Marcus  
**Subject:** Summary of SAB meeting

Hi All,

The Chartered SAB had their meeting yesterday and discussed their draft recommendations on the Framework; below is a high level summary of that meeting. Please let Sara or I know if you have any questions.

- The Chartered SAB held a quality review of the SAB draft peer review report for EPA's *Framework for Assessing Biogenic CO2 Emissions from Stationary Sources*
- Members of the public provided both written and oral comments:
  - Six members of the former SAB Biogenic Carbon Panel (BCE) participated: 4 strongly opposed recommendations for retrospective analysis, the policy horizon timeframe, and that simpler models are better. They also were upset about how SAB handled the peer review process. 2 agreed to some degree with the SAB recommendations, with caveats.
  - NGOs disagreed with SAB recommendations of a reference point baseline approach. They reiterated preference of a shorter future timeframe and landscape level analysis.
  - Members of industry/academics expressed their agreement with using a reference point approach. They also stated support for long timeframes (over which all emissions impacts are considered).
- SAB Lead Authors (Drs. Steven Hamburg, William Schlesinger, Jeanne VanBriesen) provided an overview of the SAB draft review report and answered questions from SAB members.
- Follow-up comments were provided by the SAB Lead Reviewers (Drs. Rodney Andrews, Surabi Menon, Larry Monroe). General comments they provided:
  - There is a lack of quality in the writing and clarity of SAB's draft report, enough so that it should not be approved as is and instead sent back for revision.
  - Discussion needed on the tradeoffs of taking various approaches and models.
  - SAB does not adequately answer the EPA charge questions.
  - Clarification of what is meant by policy context (i.e., policy goals).
- Next steps:
  - The SAB draft review report will be revised by SAB Lead Authors, Lead Reviewers and other SAB members wanting to participate.

- Revisions will clarify what SAB means by policy context, the timeframe recommendations, and what charge questions SAB are not addressing (rather than simply ignoring those questions).
- The revised report will go to the SAB Chair for approval, finalization and submission to the EPA Administrator.

Thanks,  
John

Message

---

**From:** Hunt, Tim [Tim\_Hunt@afandpa.org]  
**Sent:** 11/8/2018 4:07:54 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**CC:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]  
**Subject:** RE: Nov 19 meeting

Vera,

Another heads up, since we might get into discussions and questions about the science of carbon neutrality and the relevant literature, we want to include some the NCASI team that works in this area. Is that OK? Are you familiar with NCASI? Also, not sure who you will have from your end on the technical aspects but we want to anticipate being responsive to questions.

Tim

---

**From:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Sent:** Monday, November 5, 2018 1:33 PM  
**To:** Hunt, Tim <Tim\_Hunt@afandpa.org>  
**Cc:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Subject:** RE: Nov 19 meeting - call in number?

Hi Tim, yes please set up a line if you have one available.

I take it from your message below that you and/or some of your group may be in RTP in person? If so, I'll find us a meeting location.

Thanks,  
Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Hunt, Tim [[mailto:Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)]  
**Sent:** Monday, November 05, 2018 11:30 AM  
**To:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Cc:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Subject:** RE: Nov 19 meeting - call in number?

Vera,

I hope you had a good weekend.

For the 11/19 meeting, a couple of our folks would like to join by phone. You may have the same. Do you want me to set up the conference line? Alternatively, I'm glad to use yours.

Tim

---

**From:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Sent:** Thursday, November 1, 2018 11:30 AM  
**To:** Hunt, Tim <[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)>  
**Cc:** Johnson, Yvonne W <[Johnson.Yvonne@epa.gov](mailto:Johnson.Yvonne@epa.gov)>  
**Subject:** RE: Nov 13 meeting

Hi Tim, I haven't checked in with everyone on the EPA side but based on calendars, it looks like there could be a 2-hour slot on 11/19 (from 1-3) where some individuals from the EPA team could be available for portions of that period.

We could not meet on 11/13 and have this meeting on 11/19 – maybe 1-2 hours. This should give us a sense of whether we also need to meet on 12/13.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Hunt, Tim [[mailto:Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)]  
**Sent:** Thursday, November 01, 2018 9:56 AM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Subject:** Re: Nov 13 meeting

Vera, quick thought, can we get more time if we moved to Nov 19th. I think I remember that would be an open time for you and maybe the team.

Tim Hunt  
Sent from my iPhone

On Oct 31, 2018, at 4:30 PM, Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)> wrote:

Hi Tim, unfortunately no, the meetings I already have scheduled on the 13<sup>th</sup> aren't ones that I can move around.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Hunt, Tim [[mailto:Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)]  
**Sent:** Wednesday, October 31, 2018 4:14 PM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Subject:** Re: Nov 13 meeting

Vera, did you have another opening on the 13th in addition to 9 to 10? We will probably visit other epa offices but could jump back into another meeting with you if there is another 30 or 60 minutes. Thanks for considering.

Tim Hunt  
Sent from my iPhone

On Oct 29, 2018, at 10:16 AM, Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)> wrote:

Hi Tim, thanks for your message and voicemail. I will give you a call later today - the 13th is tight and I was checking on a couple scheduling issues before getting back to you. That said, I appreciate your urgency and I will reach out to you later this morning.

Vera

Vera Kornylak  
OAQPS/AQPD  
919-541-4067  
[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

On Oct 29, 2018, at 9:57 AM, Hunt, Tim <[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)> wrote:

Vera,

I left a message last week whether you and others would be available to meet with me, Paul Noe, and our outside counsel on your efforts to draft a proposed rule on biomass in the context of PSD. Paul and I might be down in RTP that day anyway so it would be very convenient. This is important work you are doing so there is some urgency as well.

Let me know what works. Thanks,

Timothy Hunt  
Senior Director, Air Quality Programs  
AMERICAN FOREST & PAPER ASSOCIATION  
1101 K Street, N.W., Suite 700, Washington, D.C. 20005  
[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)  
202-463-2588  
[www.afandpa.org](http://www.afandpa.org)



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Message

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**From:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Sent:** 11/8/2018 3:19:26 PM  
**To:** Karen Mongoven [kmongoven@4cleanair.org]; Rao, Raj [Rao.Raj@epa.gov]; Svendsgaard, Dave [Svendsgaard.Dave@epa.gov]; Dalcher, Debra [dalcher.debra@epa.gov]; Montanez, Jessica [Montanez.Jessica@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Wood, Anna [Wood.Anna@epa.gov]; Mataway-Novak, Dylan [Mataway-Novak.Dylan@epa.gov]  
**Subject:** RE: Planning agenda for 11/14 NACAA Permitting & NSR Committee Call  
**Attachments:** ICR Renewal - Part 70\_83 FR 45926\_9-11-18.pdf; DRAFT Supporting Statement for ICR No. 1587.14, OMB No. 2060-0243.docx

Karen, I would like to add the following item, with these attachments. Dylan Mataway-Novak will be presenting.

Consultation with States on Part 70 ICR Renewal for 2019

Thanks

---

**From:** Karen Mongoven <kmongoven@4cleanair.org>  
**Sent:** Wednesday, November 07, 2018 1:50 PM  
**To:** Rao, Raj <Rao.Raj@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Svendsgaard, Dave <Svendsgaard.Dave@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>; Montanez, Jessica <Montanez.Jessica@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Wood, Anna <Wood.Anna@epa.gov>  
**Subject:** Planning agenda for 11/14 NACAA Permitting & NSR Committee Call

Hello all,

The next NACAA Permitting and New Source Review Committee call is scheduled for one week from today: **Wednesday, November 14 beginning at 12:00 noon Eastern**. What would you like to include on the EPA portion of the agenda?

We will obviously want to talk about the project aggregation reconsideration final action announced today. Whom shall I put down to talk about that?

We would also appreciate updates on the ambient air guidance, the project emissions accounting rulemaking, the OIAI rulemaking, any rulemaking on biogenic CO2 permitting, and anything else in the pipeline. Please let me know what you are able to report on – thanks so much!

-Karen

\* \* \*

Karen K. Mongoven  
Senior Staff Associate  
National Association of Clean Air Agencies  
444 North Capitol Street, NW, Suite 307  
Washington, DC 20001  
Phone: (202) 624-7864  
Fax: (202) 624-7863  
[kmongoven@4cleanair.org](mailto:kmongoven@4cleanair.org)

Message

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**From:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Sent:** 12/20/2018 3:01:09 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**CC:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** Treatment of Biogenic Carbon Dioxide  
**Attachments:** Treatment of Biogenic Carbon Dioxide.docx

Dave provided some revisions for the ACE section.

**From:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]  
**Sent:** 8/20/2018 6:56:25 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]  
**Subject:** RE: QFR from recent Administrator Hearing

## Ex. 5 Deliberative Process (DP)

---

**From:** Kornylak, Vera S.  
**Sent:** Monday, August 20, 2018 2:56 PM  
**To:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** RE: QFR from recent Administrator Hearing

## Ex. 5 Deliberative Process (DP)

**From:** Johnson, Yvonne W  
**Sent:** Monday, August 20, 2018 2:27 PM  
**To:** Santiago, Juan <Santiago.Juan@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Subject:** QFR from recent Administrator Hearing

## Ex. 5 Deliberative Process (DP)

**OAQPS:** In April, EPA issued a policy statement announcing that it would proactively address congressional directives and stakeholder concerns, by treating biogenic emissions from forest biomass as

carbon neutral in a forthcoming regulatory action. What is the timeframe in which we can expect the proposed regulation will issue?

---

Thank you,

***Yvonne W. Johnson***

Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
[johnson.yvonnew@epa.gov](mailto:johnson.yvonnew@epa.gov)

Message

---

**From:** Santiago, Juan [Santiago.Juan@epa.gov]  
**Sent:** 4/26/2018 5:20:09 PM  
**To:** Long, Pam [Long.Pam@epa.gov]; Mathias, Scott [Mathias.Scott@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Ling, Michael [Ling.Michael@epa.gov]  
**CC:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]; Wood, Anna [Wood.Anna@epa.gov]  
**Subject:** RE: ACTION ITEM: Updated priority schedule - Feedback to Pam needed by 11:30 Monday 4/30  
**Attachments:** NSR Project Tracker 042618.docx

## Ex. 5 Deliberative Process (DP)

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**From:** Long, Pam  
**Sent:** Thursday, April 26, 2018 11:49 AM  
**To:** Mathias, Scott <Mathias.Scott@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Ling, Michael <Ling.Michael@epa.gov>  
**Cc:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>; Wood, Anna <Wood.Anna@epa.gov>  
**Subject:** ACTION ITEM: Updated priority schedule - Feedback to Pam needed by 11:30 Monday 4/30  
**Importance:** High

Please review this priority spreadsheet - specifically – lines 17, 19, and 21. I have edited based on what I know from recent dates in ADP tracker and reports. Items underlined indicates they

## Ex. 5 Deliberative Process (DP)

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**From:** Koerber, Mike  
**Sent:** Thursday, April 26, 2018 11:09 AM  
**To:** Eck, Janet <Eck.Janet@epa.gov>; Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>; Long, Pam <Long.Pam@epa.gov>  
**Cc:** Rimer, Kelly <Rimer.Kelly@epa.gov>; Henigin, Mary <Henigin.Mary@epa.gov>  
**Subject:** RE: Updated priority schedule

Peter has a meeting with Andrew Wheeler late in the day on Monday. It might be helpful to have an update of our priority spreadsheet. Please review the following lines (by, say, noon Monday):

### Ex. 5 Deliberative Process (DP)

Thank you.

Mike

---

**From:** Eck, Janet  
**Sent:** Monday, March 26, 2018 10:16 AM  
**To:** Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>  
**Cc:** Rimer, Kelly <[Rimer.Kelly@epa.gov](mailto:Rimer.Kelly@epa.gov)>  
**Subject:** RE: Updated priority schedule

## Ex. 5 Deliberative Process (DP)

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**From:** Koerber, Mike  
**Sent:** Monday, March 19, 2018 7:58 AM  
**To:** Eck, Janet <[Eck.Janet@epa.gov](mailto:Eck.Janet@epa.gov)>  
**Subject:** Updated priority schedule

## Ex. 5 Deliberative Process (DP)

| Project                                    | Target Completion Date | Current Status | Key Milestones | OAQPS/OGC Staff | Comments |
|--|------------------------|----------------|----------------|-----------------|----------|
| <div>Ex. 5 Deliberative Process (DP)</div> |                        |                |                |                 | hed      |
|  |                        |                |                |                 |          |



| Project                                  | Target Completion Date | Current Status | Key Milestones | OAQPS/OGC Staff | Comments |
|--|------------------------|----------------|----------------|-----------------|----------|
| <h1>Ex. 5 Deliberative Process (DP)</h1> |                        |                |                |                 |          |

| Project                                    | Target Completion Date | Current Status | Key Milestones | OAQPS/OGC Staff | Comments |
|--|------------------------|----------------|----------------|-----------------|----------|
| <div>Ex. 5 Deliberative Process (DP)</div> |                        |                |                |                 |          |

| Project                                  | Target Completion Date | Current Status | Key Milestones | OAQPS/OGC Staff | Comments |
|--|------------------------|----------------|----------------|-----------------|----------|
| <h1>Ex. 5 Deliberative Process (DP)</h1> |                        |                |                |                 |          |

| Project                                  | Target Completion Date | Current Status | Key Milestones | OAQPS/OGC Staff | Comments |
|--|------------------------|----------------|----------------|-----------------|----------|
| <h1>Ex. 5 Deliberative Process (DP)</h1> |                        |                |                |                 |          |

| Project                                | Target Completion Date | Current Status | Key Milestones | OAQPS/OGC Staff | Comments |
|--|------------------------|----------------|----------------|-----------------|----------|
| <b>Ex. 5 Deliberative Process (DP)</b> |                        |                |                |                 |          |

| Project  | Target Completion Date | Current Status                                    | Key Milestones  | OAQPS/OGC Staff                                     | Comments  |
|--|------------------------|---|---|---|---|
| <b>Biomass</b><br><br><div>Ex. 5 Deliberative Process (DP)</div> |                        | Tiering request for this rule has been submitted. | Early Guidance - <div>Ex. 5 Deliberative Process (DP)</div><br>Detailed Analytical Blueprint - <div>Ex. 5 Deliberative Process (DP)</div><br>Options selection - <div>Ex. 5 Deliberative Process (DP)</div><br>Draft proposal FRN to WG on <div>Ex. 5 Deliberative Process (DP)</div> | Jessica Montañez,<br>Carrie Wheeler/Nora Greenglass | Policy statement on Forest Biomass issued by the Administrator on 4/23/18 |

Message

---

**From:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Sent:** 5/2/2019 2:57:38 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** RE: AF&PA Meeting (PSD Biomass)

## Ex. 5 Deliberative Process (DP)

Cheryl Vetter  
U.S. Environmental Protection Agency  
OAQPS/AQPD/OPG (C504-03)  
Research Triangle Park, NC 27711  
Phone (919) 541-4391 Fax (919) 541-5509  
Note: Positions or views expressed here do not represent official EPA policy.

---

**From:** Kornylak, Vera S.  
**Sent:** Thursday, May 02, 2019 9:31 AM  
**To:** Doster, Brian <Doster.Brian@epa.gov>; Greenglass, Nora <Greenglass.Nora@epa.gov>; Ohrel, Sara <Ohrel.Sara@epa.gov>; Fawcett, Allen <Fawcett.Allen@epa.gov>  
**Cc:** Baker, Sarah <baker.sarah@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Subject:** FW: AF&PA Meeting (PSD Biomass)

Hi All, AF&PA will be meeting with OAQPS in person here in RTP. They have specifically requested that they hope OGC can join us and OAP, I hope you can join as well. Feel free to forward to whoever makes sense in your organizations. Call in to follow.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Ohrel, Sara [Ohrel.Sara@epa.gov]  
**Sent:** 5/2/2019 1:59:16 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**CC:** Baker, Sarah [baker.sarah@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** RE: AF&PA Meeting (PSD Biomass)

## Ex. 5 Deliberative Process (DP)

**From:** Kornylak, Vera S.  
**Sent:** Thursday, May 02, 2019 9:53 AM  
**To:** Ohrel, Sara <Ohrel.Sara@epa.gov>  
**Cc:** Baker, Sarah <baker.sarah@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>  
**Subject:** Re: AF&PA Meeting (PSD Biomass)

## Ex. 5 Deliberative Process (DP)

Vera Kornylak  
OAQPS/AQPD  
919-541-4067  
[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

On May 2, 2019, at 9:48 AM, Ohrel, Sara <[Ohrel.Sara@epa.gov](mailto:Ohrel.Sara@epa.gov)> wrote:

Thank you for sending this along, Vera. A few of us from OAP can certainly call in.  
Best,  
Sara

---

**From:** Kornylak, Vera S.  
**Sent:** Thursday, May 02, 2019 9:31 AM  
**To:** Doster, Brian <[Doster.Brian@epa.gov](mailto:Doster.Brian@epa.gov)>; Greenglass, Nora <[Greenglass.Nora@epa.gov](mailto:Greenglass.Nora@epa.gov)>; Ohrel, Sara <[Ohrel.Sara@epa.gov](mailto:Ohrel.Sara@epa.gov)>; Fawcett, Allen <[Fawcett.Allen@epa.gov](mailto:Fawcett.Allen@epa.gov)>  
**Cc:** Baker, Sarah <[baker.sarah@epa.gov](mailto:baker.sarah@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Johnson, Yvonne W <[Johnson.YvonneW@epa.gov](mailto:Johnson.YvonneW@epa.gov)>  
**Subject:** FW: AF&PA Meeting (PSD Biomass)

Hi All, AF&PA will be meeting with OAQPS in person here in RTP. They have specifically requested that they hope OGC can join us and OAP, I hope you can join as well. Feel free to forward to whoever makes sense in your organizations. Call in to follow.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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Message

---

**From:** Wood, Anna [Wood.Ann@epa.gov]  
**Sent:** 5/7/2018 10:07:44 PM  
**To:** Rao, Raj [Rao.Raj@epa.gov]; Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]  
**CC:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Brachtl, Megan [Brachtl.Megan@epa.gov]; Jones, Rhea [Jones.Rhea@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Ling, Michael [Ling.Michael@epa.gov]; Mathias, Scott [Mathias.Scott@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]  
**Subject:** RE: AF&PA to be here at RTP Wednesday. would you like staff to attend?

My preference is to leave it as is if we can make that work—less hassle for all involved—thx!

---

**From:** Rao, Raj  
**Sent:** Monday, May 07, 2018 6:07 PM  
**To:** Wood, Anna <Wood.Ann@epa.gov>; Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Cc:** Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Brachtl, Megan <Brachtl.Megan@epa.gov>; Jones, Rhea <Jones.Rhea@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Ling, Michael <Ling.Michael@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** RE: AF&PA to be here at RTP Wednesday. would you like staff to attend?

I also noticed that AQAD folks are also invited to the 2 pm session although I do not see AQAD related agenda items – is that an error? Also, Cheryl we can go first on the agenda for the APM Meeting and be done by 2-2.15– so probably can leave the permitting session as is at 2pm.

Raj Rao, P.E.  
Group Leader, New Source Review Group,  
Air Quality Policy Division,  
Office of Air Quality Planning and Standards (MD-C504-03)  
US Environmental Protection Agency  
109 TW Alexander Drive  
Research Triangle Park, NC 27709  
919-541-5344  
919-541-5509 - Fax

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---

**From:** Wood, Anna  
**Sent:** Monday, May 07, 2018 6:00 PM  
**To:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Cc:** Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Brachtl, Megan <Brachtl.Megan@epa.gov>; Jones, Rhea <Jones.Rhea@epa.gov>; Rao, Raj <Rao.Raj@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Ling, Michael <Ling.Michael@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** RE: AF&PA to be here at RTP Wednesday. would you like staff to attend?

I don't know the answer to that one—also are the NAAQS folks available for the 200pm slot if we switch—please check on that aspect first before we switch the times—thanks!

---

**From:** Johnson, Yvonne W  
**Sent:** Monday, May 07, 2018 5:49 PM  
**To:** Wood, Anna <Wood.Ann@epa.gov>

**Cc:** Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Brachtl, Megan <Brachtl.Megan@epa.gov>; Jones, Rhea <Jones.Rhea@epa.gov>; Rao, Raj <Rao.Raj@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Ling, Michael <Ling.Michael@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** Re: AF&PA to be here at RTP Wednesday. would you like staff to attend?

I can try but how important is it that we transition from the discussion with Peter followed directly by the more in-depth one with AQPD as it is set up now

Thank you,  
Yvonne W. Johnson

Sent from my EPA iPhone

On May 7, 2018, at 5:17 PM, Wood, Anna <Wood.Anna@epa.gov> wrote:

<image001.gif>

I am fine with it if we can make it work--thx

---

**From:** Vetter, Cheryl  
**Sent:** Monday, May 07, 2018 5:05 PM  
**To:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>; Brachtl, Megan <Brachtl.Megan@epa.gov>; Jones, Rhea <Jones.Rhea@epa.gov>; Rao, Raj <Rao.Raj@epa.gov>  
**Cc:** Wood, Anna <Wood.Anna@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Ling, Michael <Ling.Michael@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** RE: AF&PA to be here at RTP Wednesday. would you like staff to attend?

Any chance we could switch the order? Raj and I (and our key staff people) will be on the APM call starting at 2. There is a good chance that we could be done by 3.

Cheryl Vetter  
U.S. Environmental Protection Agency  
OAQPS/AQPD/OPG (C504-03)  
Research Triangle Park, NC 27711  
Phone (919) 541-4391 Fax (919) 541-5509  
Note: Positions or views expressed here do not represent official EPA policy.

---

**From:** Johnson, Yvonne W  
**Sent:** Monday, May 07, 2018 3:52 PM  
**To:** Brachtl, Megan <Brachtl.Megan@epa.gov>; Jones, Rhea <Jones.Rhea@epa.gov>; Rao, Raj <Rao.Raj@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>  
**Cc:** Wood, Anna <Wood.Anna@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Ling, Michael <Ling.Michael@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** AF&PA to be here at RTP Wednesday. would you like staff to attend?

AF&PA will be here on Wednesday. Currently, it is shown on the calendars of those noted below. GLs, if you would like someone from your staff to attend in your place or along with you please let me know.

**2 to 4 PM Meet with AQPD & AQAD**

- **2:00 – 3:00 (invited Anna, Juan, Raj, Cheryl)**
  - Biomass rulemaking – schedule, scope, rationale
  - NSR/PSD Improvements – ambient air, project aggregation, RMRR, PALs, others
  - SSM SIP Call
- **3:00 – 4:00 (invited Anna, Michael, Scott, Vera, Megan, Rhea)**
  - NAAQS implementation improvements – international transport, 126 petitions, non-attainment designations for ozone, offset policies, other issues from 4/12 Presidential memo
  - Regional Haze
  - Any other issues identified by EPA or AF&PA/AWC

---

Thank you,

***Yvonne W. Johnson***

Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
[johnson.yvonne@epa.gov](mailto:johnson.yvonne@epa.gov)

Message

---

**From:** Ashley, Jackie [Ashley.Jackie@epa.gov]  
**Sent:** 4/29/2019 1:00:23 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**CC:** Long, Pam [Long.Pam@epa.gov]; Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]; Mathias, Scott [Mathias.Scott@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** RE: CONGRESS: Biomass and carbon neutral

Thanks

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 – ashley.jackie@epa.gov

-----  
**From:** Kornylak, Vera S.  
**Sent:** Monday, April 29, 2019 8:58 AM  
**To:** Ashley, Jackie <Ashley.Jackie@epa.gov>  
**Cc:** Long, Pam <Long.Pam@epa.gov>; Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>  
**Subject:** RE: CONGRESS: Biomass and carbon neutral

Hi Jackie: I don't have anything to provide as an update to the Administrator's statement below.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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-----  
**From:** Ashley, Jackie  
**Sent:** Monday, April 29, 2019 8:48 AM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Cc:** Long, Pam <[Long.Pam@epa.gov](mailto:Long.Pam@epa.gov)>; Johnson, Yvonne W <[Johnson.Yvonnew@epa.gov](mailto:Johnson.Yvonnew@epa.gov)>  
**Subject:** CONGRESS: Biomass and carbon neutral

Good morning, Vera --

Senator Collins is asking OCIR for any additional information we can provide about the biomass neutrality rule. Basically what was referred to in the April HAC hearing:

**SIMPSON:**

*First question, a serious question. Well, they're all serious. In the past several final appropriations bill there has been a language that directed the EPA to consult with Forest Service and DOE, to provide clarity on rule that defines biomass as carbon neutral. This is important as trees are key in carbon sequestration. Almost a year ago, the EPA issues a policy statement that seemed to align with the language. Can you update this subcommittee on further steps the EPA has taken to follow the language included in the appropriations bills?*

**WHEELER:**

*We are working on that. We hope to have a proposal out this summer. It's a little more difficult than what we originally anticipated. Its taking some time. But we are moving forward with that. And we intend to have something out this summer.*

Are there any updates that can be provided to her office on this proposal the Administrator said we plan to have out this summer?

Also, do you have any overview pagers you could share for my files?

Message

---

**From:** Hunt, Tim [Tim\_Hunt@afandpa.org]  
**Sent:** 11/5/2018 6:54:21 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**CC:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]  
**Subject:** RE: Nov 19 meeting - call in number?

Yes three of us and possibly a 4<sup>th</sup> would be there in person.

The call in number will be: **Ex. 6 Personal Privacy (PP)** if you want to share with others up here in DC.

Let us know the room number but the usual pattern is to have someone meet us at the guard's desk and take us to the room. There is a chance I might meet with other EPA folks before or afterwards.

Tim

---

**From:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Sent:** Monday, November 5, 2018 1:33 PM  
**To:** Hunt, Tim <Tim\_Hunt@afandpa.org>  
**Cc:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Subject:** RE: Nov 19 meeting - call in number?

Hi Tim, yes please set up a line if you have one available.

I take it from your message below that you and/or some of your group may be in RTP in person? If so, I'll find us a meeting location.

Thanks,  
Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Hunt, Tim [[mailto:Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)]  
**Sent:** Monday, November 05, 2018 11:30 AM  
**To:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Cc:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Subject:** RE: Nov 19 meeting - call in number?

Vera,

I hope you had a good weekend.

For the 11/19 meeting, a couple of our folks would like to join by phone. You may have the same. Do you want me to set up the conference line? Alternatively, I'm glad to use yours.

Tim

---

**From:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Sent:** Thursday, November 1, 2018 11:30 AM  
**To:** Hunt, Tim <Tim\_Hunt@afandpa.org>  
**Cc:** Johnson, Yvonne W <Johnson.Yvonne@epa.gov>  
**Subject:** RE: Nov 13 meeting

Hi Tim, I haven't checked in with everyone on the EPA side but based on calendars, it looks like there could be a 2-hour slot on 11/19 (from 1-3) where some individuals from the EPA team could be available for portions of that period.

We could not meet on 11/13 and have this meeting on 11/19 – maybe 1-2 hours. This should give us a sense of whether we also need to meet on 12/13.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Hunt, Tim [[mailto:Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)]  
**Sent:** Thursday, November 01, 2018 9:56 AM  
**To:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Subject:** Re: Nov 13 meeting

Vera, quick thought, can we get more time if we moved to Nov 19th. I think I remember that would be an open time for you and maybe the team.

Tim Hunt  
Sent from my iPhone

On Oct 31, 2018, at 4:30 PM, Kornylak, Vera S. <Kornylak.Vera@epa.gov> wrote:

Hi Tim, unfortunately no, the meetings I already have scheduled on the 13<sup>th</sup> aren't ones that I can move around.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Hunt, Tim [[mailto:Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)]  
**Sent:** Wednesday, October 31, 2018 4:14 PM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Subject:** Re: Nov 13 meeting

Vera, did you have another opening on the 13th in addition to 9 to 10? We will probably visit other epa offices but could jump back into another meeting with you if there is another 30 or 60 minutes. Thanks for considering.

Tim Hunt  
Sent from my iPhone

On Oct 29, 2018, at 10:16 AM, Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)> wrote:

Hi Tim, thanks for your message and voicemail. I will give you a call later today - the 13th is tight and I was checking on a couple scheduling issues before getting back to you. That said, I appreciate your urgency and I will reach out to you later this morning.

Vera

Vera Kornylak  
OAQPS/AQPD  
919-541-4067  
[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

On Oct 29, 2018, at 9:57 AM, Hunt, Tim <[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)> wrote:

Vera,

I left a message last week whether you and others would be available to meet with me, Paul Noe, and our outside counsel on your efforts to draft a proposed rule on biomass in the context of PSD. Paul and I might be down in RTP that day anyway so it would be very convenient. This is important work you are doing so there is some urgency as well.

Let me know what works. Thanks,

Timothy Hunt  
Senior Director, Air Quality Programs  
AMERICAN FOREST & PAPER ASSOCIATION  
1101 K Street, N.W., Suite 700, Washington, D.C. 20005  
[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)  
202-463-2588  
[www.afandpa.org](http://www.afandpa.org)



<image002.jpg> <image003.jpg><image004.jpg><image005.jpg><image006.jpg>

Message

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**From:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]  
**Sent:** 5/14/2019 11:56:57 AM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** need by 9:00 today Request for talking points re: PSD Biomass  
**Attachments:** AFPA-AWC expanded agenda for EPA 5-14-19\_revised.docx

**Importance:** High

We need 2 bullets (high level) on biomass for Peter to use for his meeting with AF&PA this morning. need by 9:00.

---

Thank you,

***Yvonne W. Johnson***

Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
johnson.yvonnew@epa.gov

---

**From:** Ward, Hillary  
**Sent:** Tuesday, May 14, 2019 7:54 AM  
**To:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Cc:** Koerber, Mike <Koerber.Mike@epa.gov>; McKinney, Voronina <mckinney.voronina@epa.gov>  
**Subject:** RE: Request for talking points re: PSD Biomass

Just received this updated version from KB Mills.  
9:30 confirmed  
Hillary Ward  
USEPA, Office of Air Quality Planning and Standards  
(919)541-3154

---

**From:** Johnson, Yvonne W  
**Sent:** Tuesday, May 14, 2019 7:53 AM  
**To:** Ward, Hillary <Ward.Hillary@epa.gov>  
**Cc:** Koerber, Mike <Koerber.Mike@epa.gov>; McKinney, Voronina <mckinney.voronina@epa.gov>  
**Subject:** RE: Request for talking points re: PSD Biomass

And can you confirm that he is meeting with them at 9:30. Attached is the agenda we shared with AF&PA yesterday.

---

Thank you,

***Yvonne W. Johnson***

Special Assistant to the Director  
Air Quality Policy Division

Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
[johnson.yvonne@epa.gov](mailto:johnson.yvonne@epa.gov)

---

**From:** Ward, Hillary  
**Sent:** Tuesday, May 14, 2019 7:51 AM  
**To:** Johnson, Yvonne W <[Johnson.Yvonne@epa.gov](mailto:Johnson.Yvonne@epa.gov)>  
**Cc:** Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>; McKinney, Voronina <[mckinney.voronina@epa.gov](mailto:mckinney.voronina@epa.gov)>  
**Subject:** RE: Request for talking points re: PSD Biomass

Ok . Here the update.

Need 2-3 bullets for 2 AQPD items below. Goal is 9 am. No talking points needed.

Hillary Ward  
USEPA, Office of Air Quality Planning and Standards  
(919)541-3154

---

**From:** Johnson, Yvonne W  
**Sent:** Tuesday, May 14, 2019 7:38 AM  
**To:** Ward, Hillary <[Ward.Hillary@epa.gov](mailto:Ward.Hillary@epa.gov)>  
**Cc:** Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>; McKinney, Voronina <[mckinney.voronina@epa.gov](mailto:mckinney.voronina@epa.gov)>  
**Subject:** RE: Request for talking points re: PSD Biomass

Also, it was my understanding we did not need TPs, so based on this email. Is Peter now wanting TPs?

---

Thank you,

***Yvonne W. Johnson***  
Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
[johnson.yvonne@epa.gov](mailto:johnson.yvonne@epa.gov)

---

**From:** Ward, Hillary  
**Sent:** Tuesday, May 14, 2019 7:32 AM  
**To:** Johnson, Yvonne W <[Johnson.Yvonne@epa.gov](mailto:Johnson.Yvonne@epa.gov)>  
**Cc:** Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>; McKinney, Voronina <[mckinney.voronina@epa.gov](mailto:mckinney.voronina@epa.gov)>  
**Subject:** RE: Request for talking points re: PSD Biomass

I confirmed 9:30 time with Nina late yesterday. She can weigh in when she gets to the office.

2pm session conflicts with OAR visit so we asked for Peter to be moved to 9:30 last week. There's an email exchange with John Bradfield confirming, but I never received an updated file with the time change.

Nina probably used the time in the original file.

Hillary Ward  
USEPA, Office of Air Quality Planning and Standards  
(919)541-3154

---

**From:** Johnson, Yvonne W  
**Sent:** Tuesday, May 14, 2019 7:29 AM  
**To:** Ward, Hillary <[Ward.Hillary@epa.gov](mailto:Ward.Hillary@epa.gov)>  
**Cc:** Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>  
**Subject:** FW: Request for talking points re: PSD Biomass  
**Importance:** High

I am confused. I thought Peter was meeting with AF&PA this morning and NOT at 2:00. Please confirm

---

Thank you,

***Yvonne W. Johnson***  
Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
[johnson.yvonnew@epa.gov](mailto:johnson.yvonnew@epa.gov)

---

**From:** Mathias, Scott  
**Sent:** Monday, May 13, 2019 5:29 PM  
**To:** OAQPS AQPD GL <[OAQPS\\_AQPD\\_GL@epa.gov](mailto:OAQPS_AQPD_GL@epa.gov)>; Johnson, Yvonne W <[Johnson.Yvonnew@epa.gov](mailto:Johnson.Yvonnew@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Subject:** FW: Request for talking points re: PSD Biomass

See request below. Looks like Peter is meeting with AF&PA late in the day. Please help pull together a couple bulleted talking points for his conversation on:

1. PSD biomass
2. NSR reforms

Try to get this to Nina by 11 am or noon. Thanks.

Scott Mathias | Acting Director, Air Quality Policy Division | U.S. EPA, RTP, NC 27711 | 919.541.5310

---

**From:** McKinney, Voronina  
**Sent:** Monday, May 13, 2019 5:22 PM  
**To:** Mathias, Scott <[Mathias.Scott@epa.gov](mailto:Mathias.Scott@epa.gov)>  
**Subject:** Request for talking points re: PSD Biomass

Hello Scott,

Peter was asked to speak at the AF& PA meeting tomorrow at 2 PM. Peter would like a couple of bulleted talking points for the topic items on the agenda below that pertain to the work in AQPD. I apologize for the last minute request.

2 to 3 PM      Peter Tsirigotis:

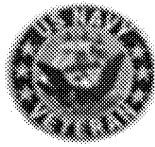
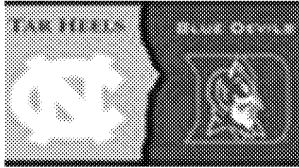
- Priorities for AF&PA/AWC (25 minutes):
  1. PSD biomass
  2. NSR reforms
  3. PM NAAQS
  4. PCWP MACT/RTR
  5. Boiler MACT

Thanks so much!

Nina

*Voronina McKinney*  
Program Specialist  
U.S. Environmental Protection Agency  
OAR | Office of Air Quality Planning and Standards | Immediate Office  
(919) 541-5616

*UNC-Chapel Hill University & Duke University Alumni | US Navy Veteran*



Message

---

**From:** Mathias, Scott [Mathias.Scott@epa.gov]  
**Sent:** 4/24/2019 7:27:06 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** Re: Biomass update

Thanks

Scott Mathias | Associate Director, Air Quality Policy Division | RTP, NC | 919.541.5310

On Apr 24, 2019, at 11:33 AM, Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)> wrote:

Hi Scott, just a heads up that I spoke with Tim Hunt (AF&PA) today and responded to his question about our path forward by letting him know that we are still discussing the options internally and do not have a path forward to share with him. He was intending to talk with his membership today in preparation for a 5/14 meeting here at OAQPS and wanted to know if I had specific information to share with him. I let him know all the options were still being discussed and I don't have specifics. After pressing multiple times about what we should talk about on 5/14, I responded each time that he/membership should use the time however they think would be useful. He finally asked whether it would be helpful to talk about the definition of biomass and I said sure.

I'm sharing this so Juan has this information as he heads to DC tomorrow (note, Tim did not indicate he was attending that). Also sharing in case Tim decides based on our conversation today that he wants to reach out to the OAQPS or OAR IO to find out why we don't have direction.

Relatedly, for your information, Sarah is working on the briefing paper for Bill on the biomass guidance, which we were told was the document we would try to revise by the end of this year (we haven't shared that publicly yet). Sarah intends to put in a meeting request for that with Bill (per his request) when we're a little farther along on the paper.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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Message

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**From:** Hunt, Tim [Tim\_Hunt@afandpa.org]  
**Sent:** 11/2/2018 5:44:52 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**CC:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]  
**Subject:** Re: Nov 13 and now 19 meeting

**Flag:** Follow up

Vera, thanks for being flexible. Let's lock in the 19th from 1 to 3 unless we can squeeze a half hour on either end just to make sure we can get through all the issues and since we will all be there in person.

We can decide after the 19th whether we want the second meeting on the 13 of December but let's hold that in place for now.

Make sense?

Tim Hunt  
Sent from my iPhone

On Nov 1, 2018, at 11:29 AM, Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)> wrote:

Hi Tim, I haven't checked in with everyone on the EPA side but based on calendars, it looks like there could be a 2-hour slot on 11/19 (from 1-3) where some individuals from the EPA team could be available for portions of that period.

We could not meet on 11/13 and have this meeting on 11/19 – maybe 1-2 hours. This should give us a sense of whether we also need to meet on 12/13.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Hunt, Tim [[mailto:Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)]  
**Sent:** Thursday, November 01, 2018 9:56 AM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Subject:** Re: Nov 13 meeting

Vera, quick thought, can we get more time if we moved to Nov 19th. I think I remember that would be an open time for you and maybe the team.

Tim Hunt  
Sent from my iPhone

On Oct 31, 2018, at 4:30 PM, Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)> wrote:

Hi Tim, unfortunately no, the meetings I already have scheduled on the 13<sup>th</sup> aren't ones that I can move around.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Hunt, Tim [[mailto:Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)]  
**Sent:** Wednesday, October 31, 2018 4:14 PM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Subject:** Re: Nov 13 meeting

Vera, did you have another opening on the 13th in addition to 9 to 10? We will probably visit other epa offices but could jump back into another meeting with you if there is another 30 or 60 minutes. Thanks for considering.

Tim Hunt  
Sent from my iPhone

On Oct 29, 2018, at 10:16 AM, Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)> wrote:

Hi Tim, thanks for your message and voicemail. I will give you a call later today - the 13th is tight and I was checking on a couple scheduling issues before getting back to you. That said, I appreciate your urgency and I will reach out to you later this morning.

Vera

Vera Kornylak  
OAQPS/AQPD  
919-541-4067  
[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

On Oct 29, 2018, at 9:57 AM, Hunt, Tim <[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)> wrote:

Vera,

I left a message last week whether you and others would be available to meet with me, Paul Noe, and our outside counsel on your efforts to draft a proposed rule on biomass in the context of PSD. Paul and I might be down in RTP that day anyway so it would be very convenient. This is important work you are doing so there is some urgency as well.



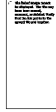
Let me know what works. Thanks,

Timothy Hunt  
Senior Director, Air Quality Programs  
AMERICAN FOREST & PAPER ASSOCIATION  
1101 K Street, N.W., Suite 700, Washington, D.C.  
20005

**Tim\_Hunt@afandpa.org**

202-463-2588

www.afandpa.org



<image002.jpg> <image003.jpg><image004.jpg><imag  
e005.jpg><image006.jpg>

Message

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**From:** Long, Pam [Long.Pam@epa.gov]  
**Sent:** 1/16/2018 2:04:13 PM  
**To:** Santiago, Juan [Santiago.Juan@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** RE: Question - Meeting Requests - Regional Haze Rule Revisions (Part II) and Biomass and Permitting

Thank you.

---

**From:** Santiago, Juan  
**Sent:** Tuesday, January 16, 2018 9:04 AM  
**To:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Long, Pam <Long.Pam@epa.gov>  
**Subject:** RE: Question - Meeting Requests - Regional Haze Rule Revisions (Part II) and Biomass and Permitting

I'll get you one on biomass

---

**From:** Kornylak, Vera S.  
**Sent:** Tuesday, January 16, 2018 9:02 AM  
**To:** Long, Pam <Long.Pam@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** RE: Question - Meeting Requests - Regional Haze Rule Revisions (Part II) and Biomass and Permitting

Rhea & RH team are working on the RH request.

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Long, Pam  
**Sent:** Tuesday, January 16, 2018 8:56 AM  
**To:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** Question - Meeting Requests - Regional Haze Rule Revisions (Part II) and Biomass and Permitting  
**Importance:** High

Am I anticipating meeting requests from you two on the two subject matters below or do I need to task Rhea and Raj/Cheryl?

---

**From:** Koerber, Mike  
**Sent:** Friday, January 12, 2018 8:18 AM  
**To:** Johnson, Yvonne W <Johnson.Yvonne@epa.gov>; Keating, Martha <keating.martha@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>; Scavo, Kimber <Scavo.Kimber@epa.gov>  
**Cc:** Wood, Anna <Wood.Anna@epa.gov>; Sasser, Erika <Sasser.Erika@epa.gov>; Wesson, Karen <Wesson.Karen@epa.gov>; South, Peter <South.Peter@epa.gov>  
**Subject:** Meeting Requests

If you haven't already, then please provide meeting requests with Bill W. for the following:

2015 O3 NAAQS – early in the week of Jan 22 - HEID

Regional Haze Rule Revisions (Part II)

Biomass and Permitting – week of Jan 29

Message

---

**From:** Long, Pam [Long.Pam@epa.gov]  
**Sent:** 1/16/2018 2:03:35 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]  
**Subject:** RE: Question - Meeting Requests - Regional Haze Rule Revisions (Part II) and Biomass and Permitting

Great – thank you!

---

**From:** Kornylak, Vera S.  
**Sent:** Tuesday, January 16, 2018 9:02 AM  
**To:** Long, Pam <Long.Pam@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** RE: Question - Meeting Requests - Regional Haze Rule Revisions (Part II) and Biomass and Permitting

Rhea & RH team are working on the RH request.

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Long, Pam  
**Sent:** Tuesday, January 16, 2018 8:56 AM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>  
**Subject:** Question - Meeting Requests - Regional Haze Rule Revisions (Part II) and Biomass and Permitting  
**Importance:** High

Am I anticipating meeting requests from you two on the two subject matters below or do I need to task Rhea and Raj/Cheryl?

---

**From:** Koerber, Mike  
**Sent:** Friday, January 12, 2018 8:18 AM  
**To:** Johnson, Yvonne W <[Johnson.YvonneW@epa.gov](mailto:Johnson.YvonneW@epa.gov)>; Keating, Martha <[keating.martha@epa.gov](mailto:keating.martha@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>; Scavo, Kimber <[Scavo.Kimber@epa.gov](mailto:Scavo.Kimber@epa.gov)>  
**Cc:** Wood, Anna <[Wood.Anna@epa.gov](mailto:Wood.Anna@epa.gov)>; Sasser, Erika <[Sasser.Erika@epa.gov](mailto:Sasser.Erika@epa.gov)>; Wesson, Karen <[Wesson.Karen@epa.gov](mailto:Wesson.Karen@epa.gov)>; South, Peter <[South.Peter@epa.gov](mailto:South.Peter@epa.gov)>  
**Subject:** Meeting Requests

If you haven't already, then please provide meeting requests with Bill W. for the following:

2015 O3 NAAQS – early in the week of Jan 22 - HEID

Regional Haze Rule Revisions (Part II)

Biomass and Permitting – week of Jan 29

Message

---

**From:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]  
**Sent:** 4/10/2017 3:12:05 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** FW: BurdenReductionOptionsTable\_title v  
**Attachments:** BurdenReductionOptionsTable SLPG.DOCX; BurdenReductionOptionsTable\_NSRG040717.docx;  
BurdenReductionOptionsTable\_NSRG040717.docx

OPG, SLPG, NSRG GSG coming separately.

**Burden Reductions Options Table (Title V)**

| Rule or Program Area | Stakeholder Request or Burden Reduction Option  | Potential Response  | Category* | Notes  |
|----------------------|---|---|-----------|--|
| Title V Permitting   | <b>Ex. 5 Deliberative Process (DP)</b>  |   |           | This was an earlier attempt to reduce burden that was challenged. We need to address the challenge in order to retain the burden reduction.  |
| Title V Permitting   | <b>Biomass:</b> Clarify the treatment of biogenic CO <sub>2</sub> emissions in permitting | Determining whether biogenic CO <sub>2</sub> is to be counted in assessing emissions from stationary sources is important to certain industries, particularly in the wood products/pulp and paper sector. A decision could be announced through guidance or rulemaking. | 2         | Determining how to address biogenically-derived CO <sub>2</sub> emissions is part of regulating the pollutant. Making a determination on how to address these emissions could be a burden reduction for certain industries.                              |
| Title V Permitting   | <b>Ex. 5 Deliberative Process (DP)</b>  |   |           | This relates to existing provisions of rules that are outdated because of new technology. We can streamline required reporting by allowing it to be done electronically and we can better track our commitments by making data available electronically. |

|  |  |  |  |  |
|--|--|--|--|--|
|  |  | <div>Ex. 5 Deliberative Process (DP)</div> |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

\*Which category does action fall under:

1. Are there existing **rules, regulations, and/or guidance documents** for which there are elements or entire sections about which you have heard specific complaints (e.g., unnecessarily excessive or redundant) from stakeholders and for which there are known solutions within the bounds of the Clean Air Act that would make them less burdensome?
2. Which existing **regulations – or parts of regulations** – have stakeholders asked to have repealed, replaced, or modified for which there are solutions within the bounds of the Clean Air Act to make them less burdensome? Particular parts of regulations of interest could include emission measurements and reporting requirements, and analysis or demonstration requirements.
3. Are there **requirements in any regulations** that could be repealed, replaced or modified, within the bounds of the Clean Air Act, that would make them less burdensome? For example, recent agency rule effectiveness efforts may have identified possible actions or opportunities for reducing burden.



Message

---

**From:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Sent:** 5/1/2017 7:01:01 PM  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**CC:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]; Wheeler, Carrie [Wheeler.Carrie@epa.gov]  
**Subject:** FW: Biomass  
**Attachments:** Biomass.docx

Thanks for the heads up. Vera, this looks similar, not identical, to the text we were reviewing last year.

Jessica

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407, Fax: 919-541-5509  
Note: Positions or views expressed here do not represent official EPA policy.

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---

**From:** Vetter, Cheryl  
**Sent:** Monday, May 01, 2017 1:55 PM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>; Wheeler, Carrie <Wheeler.Carrie@epa.gov>  
**Subject:** Biomass

FYI –

Rider in the budget on biomass.

Message

---

**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 3/16/2020 4:07:04 PM  
**To:** Long, Pam [Long.Pam@epa.gov]  
**CC:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]; Mathias, Scott [Mathias.Scott@epa.gov]  
**Subject:** RE: Question - ACTION: Critical and Time Sensitive Actions

Hi Pam, so sounds like just biogenic CO2.

Vera

---

**From:** Long, Pam <Long.Pam@epa.gov>  
**Sent:** Monday, March 16, 2020 11:35 AM  
**To:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>  
**Cc:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Subject:** RE: Question - ACTION: Critical and Time Sensitive Actions

As far as regional actions, we normally do not report for them – leave it to them. The other actions on our list are not time sensitive nor critical that I see in my eyes. Biomass is the only thing I can think of the has a push from the Administrator to get done.

---

**From:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Sent:** Monday, March 16, 2020 11:24 AM  
**To:** Santiago, Juan <Santiago.Juan@epa.gov>; Long, Pam <Long.Pam@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>  
**Cc:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Subject:** RE: Question - ACTION: Critical and Time Sensitive Actions

Hi All, so did Kevin confirm that we're not going to provide things we're working on, even if in the reg agenda? When I compare Pam's AQPD weekly tracker to just one item: biomass, seems like we are not including a lot.

I'm fine with that BTW, just trying to make sure our response is consistent with other divisions.

What if we're reviewing a SIP FRN or other work product subject to a court-ordered deadline? Do we just leave that to the Region to report?

Vera

---

**From:** Santiago, Juan <Santiago.Juan@epa.gov>  
**Sent:** Monday, March 16, 2020 11:11 AM  
**To:** Long, Pam <Long.Pam@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Cc:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Subject:** RE: Question - ACTION: Critical and Time Sensitive Actions

From my perspective of critical I think this is correct.

Ann's email mentions actions "we have committed to (perhaps publicly) a particular schedule", this could be everything we have on the reg agenda and things we discussed with the states and enviros during our monthly calls with them but I would not include them in our response at this time.

Juan

---

**From:** Long, Pam <Long.Pam@epa.gov>  
**Sent:** Monday, March 16, 2020 11:06 AM  
**To:** Mathias, Scott <Mathias.Scott@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Cc:** Johnson, Yvonne W <Johnson.Yvonne@epa.gov>  
**Subject:** Question - ACTION: Critical and Time Sensitive Actions  
**Importance:** High

The only thing I can think of that is time sensitive for us in the next 2 months is the Biomass proposal. Do you all agree?

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

---

**From:** Chang, Alice <Chang.Alice@epa.gov>  
**Sent:** Monday, March 16, 2020 9:58 AM  
**To:** Eck, Janet <Eck.Janet@epa.gov>; Long, Pam <Long.Pam@epa.gov>; Chappell, Regina <Chappell.Regina@epa.gov>; Brown, Kelly <Brown.Kelly@epa.gov>  
**Cc:** Iglesias, Amber <Iglesias.Amber@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Subject:** FW: ACTION: Critical and Time Sensitive Actions  
**Importance:** High

Good morning! Hope everyone is staying safe and healthy in these crazy times!!

We received the following email from Ann asking us to get her a list of time-sensitive actions and anything with court-ordered deadlines. She didn't give us a timeline, so we will assume this is for 2 months out. Could you guys send me a list of things that you know of that are time-sensitive coming from your divisions ASAP?

Thank you!  
Alice

---

**From:** Campbell, Ann <Campbell.Ann@epa.gov>  
**Sent:** Monday, March 16, 2020 8:34 AM  
**To:** Culligan, Kevin <Culligan.Kevin@epa.gov>; Iglesias, Amber <Iglesias.Amber@epa.gov>; Chang, Alice <Chang.Alice@epa.gov>; Mroz, Jessica <mroz.jessica@epa.gov>; Burch, Julia <Burch.Julia@epa.gov>; Herbolsheimer, Courtney <herbolsheimer.courtney@epa.gov>; Clarke, Deirdre <clarke.deirdre@epa.gov>; Kocchi, Suzanne <Kocchi.Suzanne@epa.gov>; Cherepy, Andrea <Cherepy.Andrea@epa.gov>  
**Subject:** ACTION: Critical and Time Sensitive Actions

All, By lunchtime today, it would be great if I could get a list from each of you on critical actions, and time sensitive actions. I am deeming critical to be those actions that have legal deadlines or other drop dead dates associated with them (understanding that sometimes there is a waterfall effect (e.g., if this doesn't go, our public hearing doesn't happen, and we miss our commitment). Feel free to add on to this list if I'm thinking of it in too narrow of terms, but please let me know why it's critical. I'm looking at time sensitive actions as those that we have committed to (perhaps publicly) a particular schedule and if it doesn't go, you'll be off schedule. Again, feel free to add on, but let me know what the sensitivity is.

We have capability within OAR to digitally sign and will be proceeding with that to continue operations. Once I have the list from you I plan to work with OP to ensure they will accept our digital signature, and that they and the OA can proceed similarly. For FR notices, I understand that OP will need to work with them regarding hardcopy and CD requirements and I will pose that question to them.

Makes sense? If you have any questions or can think of things I'm missing, please shout it out. I am in the office for only a couple of hours, to clean things up.

Ann Campbell  
Chief of Staff  
EPA/Office of Air and Radiation  
Office: 202 566 1370

**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 3/12/2020 1:07:28 PM  
**To:** Lewis, Josh [Lewis.Josh@epa.gov]  
**Subject:** RE: Enviro Call tomorrow. First draft of agenda below

Thanks for the information, Josh! Hope you're well.

---

**From:** Lewis, Josh <Lewis.Josh@epa.gov>  
**Sent:** Wednesday, March 11, 2020 7:39 PM  
**To:** OAQPS SMT1 <OAQPS\_SMT1@epa.gov>; OAQPS SMT2 <OAQPS\_SMT2@epa.gov>; Terry, Sara <Terry.Sara@epa.gov>; OAQPS OD PACS <OAQPS\_OD\_PACS@epa.gov>; Johnson, Yvonne W <Johnson.Yvonne@epa.gov>  
**Subject:** Re: Enviro Call tomorrow. First draft of agenda below

## Ex. 5 Deliberative Process (DP)

On Mar 11, 2020, at 8:53 AM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

So far the only agenda items requested are the usual ones (MATs, OOOOa, etc.) Draft agenda below. I'll raise at the 9 am meeting to see if anyone has additional items/thoughts.

- HEID: Share any PM or Ozone NAAQS review updates
- SPPD:
  - MATS: Status of OMB review, plus anything to say on the status of the final SAB letter
  - Update on timeline for finalizing the 111(b) proposal for GHGs from power plants
  - Update on the Oil and Gas Policy and Technical packages
- AQPD
  - NSR Updates
    - ACE NSR revisions
    - Other NSR actions moving in the near term
  - Biogenic CO2 rule update
  - Ozone Transport
  - CTGs (Scott, are you good doing an update similar to what you did for the ADDs yesterday?)

## Ex. 5 Deliberative Process (DP)

## **Ex. 5 Deliberative Process (DP)**

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 1/9/2020 2:33:44 PM  
**To:** Lewis, Josh [Lewis.Josh@epa.gov]  
**CC:** Scott Mathias [Mathias.Scott@epa.gov]; Santiago, Juan [santiago.juan@epa.gov]  
**Subject:** RE: Updated agenda for this Thursday's enviro call

# Ex. 5 Deliberative Process (DP)

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Lewis, Josh <Lewis.Josh@epa.gov>  
**Sent:** Wednesday, January 08, 2020 4:23 PM  
**To:** OAQPS SMT1 <OAQPS\_SMT1@epa.gov>; OAQPS SMT2 <OAQPS\_SMT2@epa.gov>; Terry, Sara <Terry.Sara@epa.gov>; OAQPS OD PACS <OAQPS\_OD\_PACS@epa.gov>; Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** Updated agenda for this Thursday's enviro call

I haven't received any agenda topics from the environmental community (though I imagine I'll get some late hits tonight/tomorrow morning). For now, let's proceed with providing updates in the following order, and then we'll leave time at the end for any Qs they have. (If I get a bunch of additional topics, I'll circulate an updated agenda first thing tomorrow).

- HEID: Share any PM or Ozone NAAQS review updates
- SPPD:
  - MATS: Status of OMB review, plus anything to say in response to recent draft SAB letter
  - Update on timeline for finalizing the 111(b) proposal for GHGs from power plants
  - Update on the Oil and Gas Technical package
  - Update on MON public hearings: Jan 14 in Houston; Jan 16 in DC.

- AQPD
  - NSR Updates
    - ACE NSR revisions
    - Other NSR actions moving in the near term
  - Biogenic CO2 rule update
  - "State Implementation Plan (SIP) Lean Toolkit for Collaboration Between EPA and Air Agencies," issued 12/9
  - Final Rule Revisions to the Petition Provisions of the Title V Permitting Program, scheduled for signature this week
  - Public review draft of Guidance on the Preparation of 179B International Transport Demonstrations, scheduled for signature/release this week



Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 1/8/2020 5:59:29 PM  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Baker, Sarah [baker.sarah@epa.gov]  
**Subject:** RE: call from Tim Hunt

Cheryl, ok, Liz preferred that I respond on haze so I'll go ahead and call him now.

Vera

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Vetter, Cheryl <Vetter.Cheryl@epa.gov>  
**Sent:** Wednesday, January 08, 2020 10:09 AM  
**To:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Baker, Sarah <baker.sarah@epa.gov>  
**Subject:** RE: call from Tim Hunt

You know, I was thinking this morning in the elevator that it was about time we hear from him again. If you are calling him anyway, happy to have you cover, but if you are not, I can give him a call.

Cheryl Vetter  
U.S. Environmental Protection Agency  
OAQPS/AQPD/OPG (C504-03)  
Research Triangle Park, NC 27711  
Phone (919) 541-4391 Fax (919) 541-5509  
Note: Positions or views expressed here do not represent official EPA policy.

---

**From:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Sent:** Wednesday, January 08, 2020 9:59 AM  
**To:** Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Baker, Sarah <[baker.sarah@epa.gov](mailto:baker.sarah@epa.gov)>  
**Subject:** call from Tim Hunt

Cheryl, Sarah: I got a voicemail from Tim Hunt yesterday "checking in" after the conversation in Dec. He was wondering how things are going with the biogenic CO2 rule, whether we are moving forward to interagency review and so forth. Would one of you like to call him back? He left the following number Ex. 6 Personal Privacy (PP) Let me know what you decide – he made a regional haze comment as well so I may end up calling him on that (or perhaps Liz will), but we can keep that focused on haze if one of you wants to cover biogenic CO2.

Vera

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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## Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 12/13/2019 9:35:15 PM  
**To:** Baker, Sarah [baker.sarah@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Scott Mathias [Mathias.Scott@epa.gov]  
**Subject:** FW: Draft Proposed Biogenic CO2 Rulemaking 12-13-19.docx  
**Attachments:** Draft Proposed Biogenic CO2 Rulemaking 12-13-19.docx

FYI

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Koerber, Mike <Koerber.Mike@epa.gov>  
**Sent:** Friday, December 13, 2019 4:28 PM  
**To:** Dominguez, Alexander <dominguez.alexander@epa.gov>; Harlow, David <harlow.david@epa.gov>; Moor, Karl <Moor.Karl@epa.gov>; Cory, Preston <Cory.Preston@epa.gov>; Raymond, Kelley <Raymond.Kelley@epa.gov>  
**Cc:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Subject:** FW: Draft Proposed Biogenic CO2 Rulemaking 12-13-19.docx

Alex: As discussed this morning, here is the current draft of the proposed rule. We would appreciate any comments by Wednesday in order for us to meet the next milestone on the schedule (i.e., send to the FAR Workgroup by Dec 20). FAR has been already been scheduled for Jan 15. Please note that OGC management will review this in parallel with OAR.

# Ex. 5 Deliberative Process (DP)

A few other items worth noting:

- We understand that OP is coordinating check-in meetings with OMB, USDA and possibly others, but we do not have an update on the status of those meetings.
- We understand that OGC has set up a meeting with DOJ on Dec. 20<sup>th</sup>.

Message

---

**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 12/13/2019 8:17:20 PM  
**To:** Koerber, Mike [Koerber.Mike@epa.gov]  
**CC:** Scott Mathias [Mathias.Scott@epa.gov]; Long, Pam [Long.Pam@epa.gov]; Johnson, Yvonne W (Johnson.Yvonnew@epa.gov) [Johnson.Yvonnew@epa.gov]; Baker, Sarah [baker.sarah@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** Draft Proposed Biogenic CO2 Rulemaking 12-13-19.docx  
**Attachments:** Draft Proposed Biogenic CO2 Rulemaking 12-13-19.docx

Hi Mike:

Attached is the current draft version of the proposed rule for biogenic CO2. This should be transmitted to OAR for their review and we need any comments back from you/OAR by Dec. 18<sup>th</sup>. This is because we need to transmit the document back for distribution to the FAR workgroup by Dec. 20<sup>th</sup>. By way of reminder, the FAR is scheduled for Jan. 15<sup>th</sup>. When you transmit to OAR IO, please share that message with us because OGC would like to transmit the same version to their front office.

A few other notes:

- Pam has not yet reviewed this version and will not be able to review it prior to Dec. 20<sup>th</sup>.
- We understand that OP is coordinating check-in meetings with DOI, USDA, and possibly others but we do not have an update on the status of those meetings.
- We understand that OGC has set up a meeting with DOJ on Dec. 20<sup>th</sup>.
- 

## Ex. 5 Deliberative Process (DP)

- Please let us know if you think a check-in prior to FAR makes sense or would be helpful to resolve some of the issues where we've dropped comments.

Thanks,  
Vera

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 11/20/2019 7:02:17 PM  
**To:** Ashley, Jackie [Ashley.Jackie@epa.gov]  
**Subject:** FW: Biogenic CO2 w signatures 11.18.19.pdf  
**Attachments:** Biogenic CO2 w signatures 11.18.19.pdf

FYI -

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Steller, John <[Steller.John@epa.gov](mailto:Steller.John@epa.gov)>  
**Sent:** Wednesday, November 20, 2019 11:44 AM  
**To:** Baker, Sarah <[baker.sarah@epa.gov](mailto:baker.sarah@epa.gov)>  
**Cc:** Ohrel, Sara <[Ohrel.Sara@epa.gov](mailto:Ohrel.Sara@epa.gov)>  
**Subject:** Biogenic CO2 w signatures 11.18.19.pdf

Hi Sarah,

Just as a heads up, our office got word of the attached letter from the Hill this AM. I believe it has been assigned to OAQPS for CMS response but will let you know if we hear otherwise.

-John

# United States Senate

WASHINGTON, DC 20510

November 18, 2019

The Honorable Andrew Wheeler  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

Dear Administrator Wheeler:

We write to urge the Environmental Protection Agency (EPA) to provide regulatory clarity on the de minimis nature of biogenic carbon emissions generated from the processing of agricultural feedstocks such as corn, soybeans, oilseeds and farm residues. We were encouraged that EPA's Unified Agenda issued in spring 2019 indicated the possibility of a rulemaking on this matter in October 2019. We ask the EPA to act on this significant issue as soon as possible.

Rural communities in our states see the economic and environmental potential that a growing U.S. bioeconomy offers. EPA's treatment of biogenic carbon emissions from agricultural processing facilities, however, is a significant barrier to that growth. We have concerns that regulatory uncertainty is stalling significant potential investment in rural America. That investment would create jobs and draw resources to develop new lower-carbon products and materials, including food products, green chemicals, personal care products, compostable bioplastics, and much more.

For almost a decade now, agricultural crop producers and processors have submitted multiple requests to EPA for clarity on the regulatory treatment of biogenic carbon emissions produced by the fermentation, combustion, or other processing of agricultural crops.

Multiple scientific studies have stated that the carbon dioxide absorbed during growth and photosynthesis by renewable agricultural feedstocks, such as corn, soybeans, and oilseeds, and the carbon dioxide released during the processing, fermentation or combustion of those same feedstocks is more or less equal within a one-year cycle.<sup>1</sup> This means biogenic carbon emissions from such facilities are not contributing to long-term increases in atmospheric concentrations of greenhouse gases. Though EPA has made similar statements about the one-year life cycle of biogenic carbon emissions,<sup>2</sup> the Agency has not proposed a de minimis standard nor has the Agency taken action to clarify the treatment of biogenic carbon emissions in the context of the Clean Air Act.

It is critical that rural Americans have the ability to tap into new growth opportunities when prospects in traditional markets are uncertain or declining. Our states are ready and able to use our food and agriculture strengths to provide the nation and the world with an abundance of crop-derived consumer products and materials, as well as renewable biomass. But federal policy is deterring investment in innovation and infrastructure. As a comparison, in 2015, the

European Union's bioeconomy added over €620 billion (\$688 billion USD) of value to their broader economy.<sup>3</sup> In 2016, the U.S. bioeconomy was valued at \$459 billion.<sup>4</sup> This is EPA's opportunity to clear a pathway for our rural communities to advance both economically and environmentally.

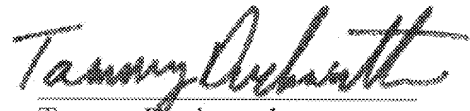
We encourage the EPA to provide clarity on the de minimis nature of biogenic carbon emissions, and would appreciate an update on policy options the EPA is considering to address this issue. Additionally, we would like to know how the EPA is collaborating with the U.S. Department of Agriculture or other agencies, and an anticipated timeline for action on the issue. We would appreciate an update on these items by December 2, 2019.

We thank you for your attention and look forward to hearing about progress towards regulatory clarity on biogenic carbon emissions.

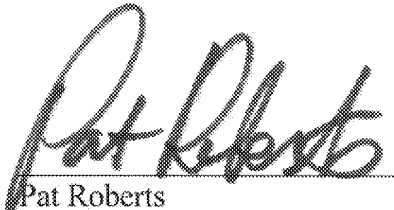
Sincerely,



Deb Fischer  
United States Senator



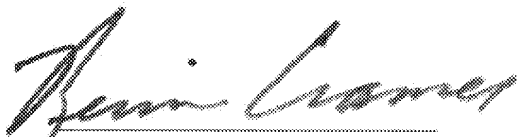
Tammy Duckworth  
United States Senator



Pat Roberts  
United States Senator



Gary Peters  
United States Senator



Kevin Cramer  
United States Senator



Tammy Baldwin  
United States Senator





Chuck Grassley  
United States Senator

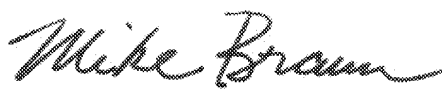



Roy Blunt  
United States Senator


  
Jerry Moran  
United States Senator


  
Joni K. Ernst  
United States Senator

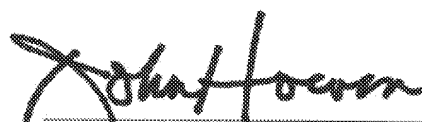
  
Podd Young  
United States Senator

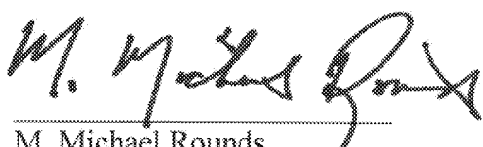
  
Mike Braun  
United States Senator


  
Ben Sasse  
United States Senator

  
Richard Burr  
United States Senator

  
John Thune  
United States Senator

  
John Hoeven  
United States Senator

  
M. Michael Rounds  
United States Senator

  
Josh Hawley  
United States Senator

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<sup>1</sup> See the 2006 IPCC Guidelines, 5 IPCC, *2006 IPCC Guidelines for National Greenhouse Gas Inventories* Vol. 4 at 2.11); and in the May 3, 2010, OMB, *Summary of Interagency comments submitted under EO12866 on EPA's draft Final PSD and Title V GHG Tailoring Rule* (EPA-HQ-OAR-2009-0517-19162)

<sup>2</sup> See March 5, 2019, report by the EPA's Science Advisory Board to the Administrator (SAB Review of Framework for Biogenic CO<sub>2</sub> Emissions from Stationary Sources), EPA-SAB-19-022, p. 13; EPA's guidance regarding biogenic carbon dioxide in its Waste Reduction Model (WARM); and in the RFS2 rulemaking's regulatory impact assessment.

<sup>3</sup> See M'Barek, Robert; Ronzon, Tévécia. *Socioeconomic Indicators to Monitor the EU's Bioeconomy in Transition*. MDPI Sustainability Vol. 10 (2018) pp. 2. <https://www.mdpi.com/2071-1050/10/6/1745>

<sup>4</sup> See Daystar, Jesse et. al. *An Economic Impact Analysis of the U.S. Biobased Products Industry*. United States Department of Agriculture BioPreferred® Program (2019) p. 4.  
<https://www.biopreferred.gov/BPResources/files/BiobasedProductsEconomicAnalysis2018.pdf>



Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 10/30/2019 1:56:09 PM  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**CC:** Baker, Sarah [baker.sarah@epa.gov]  
**Subject:** Re: Yesterday's Biomass briefing

Okay, sounds good!

Vera Kornylak  
Acting Associate Director  
Air Quality Policy Division  
OAQPS  
919-541-4067  
[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

On Oct 30, 2019, at 9:51 AM, Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)> wrote:

## Ex. 5 Deliberative Process (DP)

Cheryl Vetter  
U.S. Environmental Protection Agency  
OAQPS/AQPD/OPG (C504-03)  
Research Triangle Park, NC 27711  
Phone (919) 541-4391 Fax (919) 541-5509  
Note: Positions or views expressed here do not represent official EPA policy.

---

**From:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Sent:** Wednesday, October 30, 2019 9:40 AM  
**To:** Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>  
**Subject:** Re: Yesterday's Biomass briefing

Thanks for the update. So we are pressing ahead w Forest biomass? Has OAP done any technical analysis yet?

Vera

Vera Kornylak  
Acting Associate Director  
Air Quality Policy Division  
OAQPS  
919-541-4067  
[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

On Oct 30, 2019, at 9:35 AM, Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)> wrote:

I got to go to yesterday's Administrator discussion of the biogenic CO2 meeting. Anne was in transit, so I ran through the paper. It went well, no questions about what we are doing, but he turned immediately to the timing. He said he didn't want to compress our timing, but wanted to compress OMB's. There was some discussion with Brittany about that, and they decided that they want to have some initial presentations to OMB and USDA in early December, followed by DOJ. I think I heard them say that is the approach they have been using with WOTUS. The hope is that the early engagement will shorten their process. Our OP representative seems to want to take an active role, so this should be something that he can work on getting set up.

After the meeting, Peter and Mike and I talked about checking in with Anne in November to ensure that everything (OAP, mostly) is on track. Sarah has put together a meeting request for that, so we will get that to the 4<sup>th</sup> floor today.

Hope you have a safe trip home!

Cheryl Vetter  
U.S. Environmental Protection Agency  
OAQPS/AQPD/OPG (C504-03)  
Research Triangle Park, NC 27711  
Phone (919) 541-4391 Fax (919) 541-5509  
Note: Positions or views expressed here do not represent official EPA policy.

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 9/16/2019 1:30:00 PM  
**To:** Baker, Sarah [baker.sarah@epa.gov]  
**CC:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** RE: Biomass Briefing Document  
**Attachments:** Biogenic CO2 Coalition Petition Reconsideration EPA ACE Rule (9-5-19).pdf; Idsal Briefing 9-18-19- edited+Vera.docx

Hi Sarah, looks really good. I made a few minor edits. Send it forward once you are ready. Please make sure to include Scott and Kevin Culligan when you send it up to Mike.

BTW, I understand that Kevin Culligan is now the "Mike Koerber" (i.e., OAQPS IO contact) for us on biomass.

Vera

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Baker, Sarah <baker.sarah@epa.gov>  
**Sent:** Monday, September 16, 2019 9:11 AM  
**To:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Cc:** Vetter, Cheryl <Vetter.Cheryl@epa.gov>  
**Subject:** Biomass Briefing Document

Vera-

Attached is the briefing document that reflects both your and Cheryl's edits. It should be ready to move to Mike unless you'd like me to make any more changes. Thanks!

Sarah

Sarah Baker  
Environmental Protection Specialist  
Air Quality Policy Division, Operating Permits Group  
U.S. EPA, Office of Air Quality Planning and Standards  
(919) 541-4846 / [baker.sarah@epa.gov](mailto:baker.sarah@epa.gov)

Hon. Andrew Wheeler, Administrator  
U.S. Environmental Protection Agency  
c/o Office of the Administrator (Mail Code 1101A)  
William Jefferson Clinton South Building, Room 3000  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

cc: Nicholas Swanson  
U.S. Environmental Protection Agency  
Sector Policies and Programs Division (Mail Code D205-01)  
Office of Air Quality Planning and Standards  
Research Triangle Park, NC 27711

Associate General Counsel for Air and Radiation Law Office  
U.S. Environmental Protection Agency  
Office of General Counsel (Mail Code 2344A)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**BEFORE THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

|                                 |   |                               |
|---------------------------------|---|-------------------------------|
|                                 | ) |                               |
| Petition for Reconsideration by | ) |                               |
| Biogenic CO2 Coalition of EPA's | ) | Docket # EPA-HQ-OAR-2017-0355 |
| Affordable Clean Energy Rule    | ) |                               |
|                                 | ) |                               |

**PETITION FOR RECONSIDERATION**

*Repeal of the Clean Power Plan; Emission Guidelines for Greenhouse Gas Emissions From Existing Electric Utility Generating Units; Revisions to Emission Guidelines Implementing Regulations, 84 Fed. Reg. 32,520 (July 8, 2019); Docket # EPA-HQ-OAR-2017-0355*

The Biogenic CO2 Coalition ("***Coalition***") respectfully petitions the U.S. Environmental Protection Agency ("***Agency***") pursuant to Section 307(d)(7)(B) of the Clean Air Act, 42 U.S.C. § 7607(d)(7)(B), to reconsider the above rule ("***ACE Rule***") with respect to the Agency's treatment of biogenic carbon dioxide emissions from short-cycle agricultural crop biomass. The Coalition hereby incorporates by reference its prior comments on the proposed ACE Rule, which can be found in the rulemaking docket at the following URL: <https://www.regulations.gov/document?D=EPA-HQ-OAR-2017-0355-23710>.

**About the Biogenic CO2 Coalition**

The Biogenic CO2 Coalition has previously commented on various EPA proposals to regulate greenhouse gases, including on EPA's proposed New Source Performance Standards for the Electric Generation Sector at 79 Fed. Reg. 1,430 (Jan. 8, 2014) (EPA-HQ-OAR-2013-0495), EPA's

proposed Emission Guidelines for Existing Stationary Sources at 79 Fed. Reg. 34,830 (June 18, 2014) (EPA-HQ-OAR-2013-0602), EPA's proposed Standards for Emissions from Modified and Reconstructed Stationary Sources ("**Clean Power Plan**") at 79 Fed. Reg. 34,959 (June 18, 2014) (EPA-HQ-OAR-2013-0603), EPA's proposed Aircraft Emissions Endangerment Finding at 80 Fed. Reg. 37,757 (July 1, 2015) (EPA-HQ-OAR-2014-0828), EPA's proposed Prevention of Significant Deterioration Regulations ("**Significance Rule**") at 81 Fed. Reg. 68,110 (Oct. 3, 2016) (EPA-HQ-OAR-2015-0355), and EPA's proposed Affordable Clean Energy Rule at 83 Fed. Reg. 44,746 (Aug. 31, 2018) (EPA-HQ-OAR-2017-0355).

The stakeholders represented by the Biogenic CO<sub>2</sub> Coalition grow or process various agricultural crops and farm products (typically short-cycle herbaceous crops and crop residues) or own/operate facilities that emit or may emit carbon dioxide directly from combustion, fermentation, or microbial wastewater treatment of agricultural biomass feedstocks (referred to as "crop-derived CO<sub>2</sub>" or "biogenic CO<sub>2</sub>"). Biogenic CO<sub>2</sub> Coalition members are investing literally billions of dollars in the bioeconomy by developing bioproducts technologies, building new high-tech bioproduct production facilities, and pioneering "green chemistry" approaches to produce food, fiber, composites, consumer products, pharmaceuticals, bioplastics, biofuels, commercial chemicals, and a cornucopia of other bioproducts made from natural crop-derived materials.

The bioeconomy provides 21<sup>st</sup> century solutions to economic growth, domestic energy security, and environmental benefits in the form of bioenergy, biofuels, and bioproducts made from corn, oilseeds, crop residues, farm wastes and other agricultural feedstocks. America's bioeconomy currently contributes \$393 billion in economic activity, provides 4.2 million American jobs, and is the leading source of domestic renewable energy in the United States.<sup>1</sup> While providing food, fuel and fiber to American families, the bioeconomy also reduces 400 million tons of CO<sub>2</sub> from the atmosphere every year, thus playing a critical role in achieving climate policy goals.<sup>2</sup> The benefits of agriculture as a renewable and sustainable resource are widely recognized, and the life-cycle carbon benefits of biogenic emissions from the use or processing of biomass have been universally acknowledged by policymakers and scientists as *de minimis* or carbon neutral, and in many instances as net carbon reductions.<sup>3</sup>

Members of the Biogenic CO<sub>2</sub> Coalition are poised to invest billions of dollars to grow and expand the bioeconomy exponentially over the coming decades, if certain misguided policy barriers are removed, such as EPA's prior attempts to penalize farmers for agricultural biogenic carbon emissions as if they were fossil-based emissions and the agency's refusal to recognize the carbon life-cycle benefits of agriculture.

### **Basis for Reconsideration**

For the reasons detailed in this petition and the comments incorporated by reference herein, the Coalition respectfully requests that EPA categorically exclude from the methods for determining compliance with the ACE Rule those CO<sub>2</sub> emissions resulting from the combustion of biomass

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<sup>1</sup> See USDA, *An Economic Impact Analysis of the U.S. Biobased Products Industry* (Oct. 2016) ("2016 Biomass Report") ([www.biopreferred.gov/BPResources/files/BiobasedProductsEconomicAnalysis2016.pdf](http://www.biopreferred.gov/BPResources/files/BiobasedProductsEconomicAnalysis2016.pdf)).

<sup>2</sup> See Interagency Biomass Research and Development Board, *Federal Activities Report on the Bioeconomy* (Feb. 2016) at 6 ("2016 Biomass Board Report") ([https://www.biomassboard.gov/pdfs/farb\\_2\\_18\\_16.pdf](https://www.biomassboard.gov/pdfs/farb_2_18_16.pdf)).

<sup>3</sup> See 2016 Biomass Board Report at 1 ("Biobased products . . . recycle carbon (CO<sub>2</sub>) from the atmosphere, resulting in air quality improvements when compared to fossil fuel-based products").

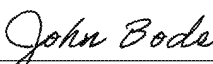
derived from short-cycle agricultural crops or crop residues and otherwise clarify that biogenic emissions are not harmful pollution under the Clean Air Act.

\* \* \* \* \*

The undersigned associations appreciate the opportunity to submit this petition for reconsideration. If you have any questions, please contact the Chair of the Coalition, John Bode, at (202) 534-3498 or [JBode@corn.org](mailto:JBode@corn.org).

September 5, 2019

Respectfully submitted,

  
\_\_\_\_\_  
John Bode, Chair  
Biogenic CO2 Coalition

**American Bakers Association**

**Corn Refiners Association**

**American Farm Bureau Federation**

**National Corn Growers Association**

## **Biogenic CO2 Coalition Trade Association Members**

**American Bakers Association (ABA)** is a national association that represents the interests of bakers before the U.S. Congress, federal agencies, and international regulatory authorities. ABA advocates on behalf of more than 700 baking facilities and baking company suppliers.



**American Farm Bureau Federation (AFBF)** is an independent, non-governmental, voluntary organization governed by and representing farm and ranch families united for the purpose of analyzing their problems and formulating action to achieve educational improvement, economic opportunity and social advancement and, thereby, to promote the national well-being. Farm Bureau is the voice of agricultural producers at all levels.



**Corn Refiners Association (CRA)** is the national trade association representing the corn refining (wet milling) industry of the United States. CRA and its predecessors have served this important segment of American agribusiness since 1913. Corn refiners manufacture starches, sweeteners, corn oil, bioproducts (including ethanol), and animal feed ingredients.



**National Corn Growers Association (NCGA)** represents more than 40,000 dues-paying corn farmers nationwide and the interests of more than 300,000 growers who contribute through corn checkoff programs in their states. NCGA and its 48 affiliated state organizations work together to create and increase opportunities for corn growers.



Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 9/12/2019 7:09:59 PM  
**To:** Baker, Sarah [baker.sarah@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** Idsal Briefing 9-18-19.docx  
**Attachments:** Idsal Briefing 9-18-19.docx



Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 10/22/2019 9:22:41 PM  
**To:** Baker, Sarah [baker.sarah@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** RE: Baker, Sarah shared "Biomass Three Rule Briefing Paper" with you.

Sarah, Cheryl: I think the paper looks okay, thanks for putting it together. Are the timelines really practical? Just curious. Also, how's OAP coming along for their bibliography they were going to be attaching?

Vera

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)


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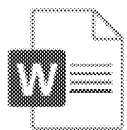
---

**From:** Baker, Sarah <baker.sarah@epa.gov>  
**Sent:** Tuesday, October 22, 2019 4:25 PM  
**To:** Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Subject:** Baker, Sarah shared "Biomass Three Rule Briefing Paper" with you.

Here is the link for the administrator briefing paper for your review. OGC is still completing its review of it as well. Thanks!

Sarah

 This link only works for the direct recipients of this message.



Biomass Three Rule Briefing Paper

Open

 Microsoft OneDrive

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 10/17/2019 5:01:37 PM  
**To:** Santiago, Juan [Santiago.Juan@epa.gov]  
**Subject:** RE: Biogenic CO2 Emissions

Thanks, I think Cheryl is already in contact with OP.

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>  
**Sent:** Thursday, October 17, 2019 10:56 AM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>  
**Cc:** Long, Pam <[Long.Pam@epa.gov](mailto:Long.Pam@epa.gov)>  
**Subject:** FW: Biogenic CO2 Emissions

Please see below...

---

**From:** Joseph, Wanda <[joseph.wanda@epa.gov](mailto:joseph.wanda@epa.gov)>  
**Sent:** Thursday, October 17, 2019 9:42 AM  
**To:** Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>  
**Subject:** Biogenic CO2 Emissions

Hi Juan,

I received a call from Barry Alman and The Mary Manibusan, Office of Policy in reference to the Reg Agenda and the Biogenic CO2 Emissions proposal dated to publish in December. Brittany thought it should be bumped to April 2020 in light of the discussion that have taken place. They would like to discuss this matter. Please give her Mary a call (202) 564-7267.

*Wanda Joseph*

Administrative Specialist  
Sector Policies and Programs Division  
109 T.W. Alexander Drive, MC: D205-01  
Research Triangle Park, NC 27711  
(919) 541-3114

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 10/17/2019 2:57:43 PM  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**CC:** Baker, Sarah [baker.sarah@epa.gov]  
**Subject:** FW: Biogenic CO2 Emissions

Cheryl: please see below, did you already talk to Barry yesterday? I have no concerns with moving the date, but since OAR IO set it, I feel that OAR IO should be included in the conversation somehow. We could let Barry know that Brittany should speak with the OAR IO about this, or else we could communicate through Mike.

Vera

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Joseph, Wanda <[joseph.wanda@epa.gov](mailto:joseph.wanda@epa.gov)>  
**Sent:** Thursday, October 17, 2019 9:42 AM  
**To:** Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>  
**Subject:** Biogenic CO2 Emissions

Hi Juan,

I received a call from Barry Alman and The Mary Manibusan, Office of Policy in reference to the Reg Agenda and the Biogenic CO2 Emissions proposal dated to publish in December. Brittany thought it should be bumped to April 2020 in light of the discussion that have taken place. They would like to discuss this matter. Please give her Mary a call (202) 564-7267.

*Wanda Joseph*  
Administrative Specialist  
Sector Policies and Programs Division  
109 T.W. Alexander Drive, MC: D205-01  
Research Triangle Park, NC 27711  
(919) 541-3114

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 10/16/2019 7:00:41 PM  
**To:** Scott Mathias [Mathias.Scott@epa.gov]  
**CC:** Santiago, Juan [santiago.juan@epa.gov]  
**Subject:** Biogenic CO2 Report Out

Hi Scott:

Today I sat in on a briefing for the Administrator on the path forward for a biogenic CO2 PSD rulemaking. Here is my report-out.

- **Next steps according to OAQPS IO and OAP (OAP confirmed this with Anne):** team prepare a pager documenting the timeline and options for 3 separate rulemakings beginning with forest-derived feedstocks, then agricultural feedstocks, then waste. This paper is due in the next week or so because we promised the Administrator that Anne would be back with him in 1-2 weeks on the timeline for the three rulemakings.
- Sarah Baker will assemble the OAP, OGC, and OAQPS team on Monday morning to discuss how to produce this paper.
- For what it's worth, here's what I heard the Administrator say:
  - Not willing to postpone a rule indefinitely due to inconclusive science
  - Not comfortable with approach 1 (i.e., appropriations language/no legal or technical support)
  - Wants to be able to point to some science
  - Wondering whether doing just forest-derived and/or other feedstocks separately might be a better path forward than merging because seems like more legal risk when merged (specifically, the feedstocks for which we may have sound technical support would be a risk of being brought down along with the feedstocks on which we have weak technical support).
  - Prefers some sort of hybrid of approaches 1 and 2 where we don't do a 1.5 year literature search but basically take 1-2 weeks to come up with some studies that support exempting feedstocks and decide what those are, then decide how we want to time the rule(s)
- OAP and OGC did most of the talking. Peter and Mike each made one small comment. We did not run through the paper although by the end OAP and OGC had mostly covered it. The Administrator asked a number of questions including:
  - Why the SAB did not reach any conclusions (e.g., was it a lack of consensus, or was the science itself inconclusive? OAP answered both.
  - Whether different feedstocks would have better science arguments. OAP answered potentially.
  - Is PSD the only way to approach exempting biogenic CO2 from regulation? OGC and OAP both answered that this seems to be where industry is focused even though permitting is not really their issue.
  - What is industry actually gaining from this rule? OGC answered that they are getting a decision from EPA that their feedstocks are carbon neutral.

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 12/19/2019 1:04:50 PM  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Baker, Sarah [baker.sarah@epa.gov]  
**CC:** Santiago, Juan [santiago.juan@epa.gov]  
**Subject:** Email from OAR IO

Hi Cheryl and Sarah: good morning. Below is an email exchange between Alex D. and Mike Koerber. I take away the following from the exchange and I'm open to your interpretations as well (cc'ing Juan just so he's aware of the exchange as well since neither Scott nor Juan were included in the message from Alex):

- Alex has no other comments on the rule document in its current version.
- Alex is requesting that we set up a meeting with Anne to discuss details about what the rule includes, and doesn't include. One purpose of this meeting with Anne would be to prep her for a conversation with the Administrator. I can't tell from the email exchange below if we should request a meeting with the Administrator or just put in a meeting request for Anne. I'm interested in your thoughts and I'll offer that I think we should put in a meeting request for Anne for early January, that way there's time for a meeting with the Administrator before 1/20. I defer to you on how to share this information with the workgroup, but I would recommend that you do so since I don't see that any other offices were included on the email from Alex below.
- We should move forward to submit the proposed rule for FAR – please let me know what you may need from me to today to help you move this forward.

Just FYI, my schedule today is the following. I'm working at home, but my phone is forwarded so please call/email if you need something. I'll be on leave starting at 3:30 and unable to do any work or check email after that time today. I've got some time this morning and then between about 2:30-3:30. So if you need me to review any documents, morning would be better for me. I'm still available at 11am if you want to meet.

On a slightly different topic, I don't think I ever responded to the email from Apple, so I was going to respond to Phill Brooks and Tony and let them know that Cheryl will be reaching out to them. I just wanted to make sure you were still comfortable with that before I did it, or perhaps you've already reached out to Tony in which case, I probably don't need to send a response.

Thanks,  
Vera

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)>  
**Sent:** Wednesday, December 18, 2019 8:12 PM  
**To:** Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>  
**Cc:** Harlow, David <[harlow.david@epa.gov](mailto:harlow.david@epa.gov)>; Moor, Karl <[Moor.Karl@epa.gov](mailto:Moor.Karl@epa.gov)>; Cory, Preston <[Cory.Preston@epa.gov](mailto:Cory.Preston@epa.gov)>;

Raymond, Kelley <Raymond.Kelley@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>

**Subject:** Re: Draft Proposed Biogenic CO2 Rulemaking 12-13-19.docx

Thanks Mike.

Sent from my iPhone

On Dec 18, 2019, at 6:48 PM, Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)> wrote:

Thanks, Alex. Yes, we'll plan to do that.

Mike

Sent from my iPhone

On Dec 18, 2019, at 7:44 PM, Dominguez, Alexander <[dominguez.alexander@epa.gov](mailto:dominguez.alexander@epa.gov)> wrote:

Mike - Apologies for my delay in getting back to you on this. I reviewed and have no concerns with this version going to FAR. I would propose that during the first few weeks of January we sit down and discuss so that well in advance of going to OMB the Administrator is made abundantly aware what is and isn't included in this NPRM (and what he agreed to during options selection).

Sent from my iPhone

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 12/18/2019 8:34:33 PM  
**To:** Baker, Sarah [baker.sarah@epa.gov]  
**CC:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** FW: Updated Biogenic CO2 RM document  
**Attachments:** Draft Proposed Biogenic CO2 Rulemaking 12-18-19.docx

Sarah – just sharing the email below with you.

Vera

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Kornylak, Vera S.  
**Sent:** Wednesday, December 18, 2019 3:34 PM  
**To:** Dominguez, Alexander <dominguez.alexander@epa.gov>  
**Cc:** Koerber, Mike <Koerber.Mike@epa.gov>; Johnson, Yvonne W (Johnson.Yvonnew@epa.gov) <Johnson.Yvonnew@epa.gov>; Santiago, Juan <santiago.juan@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>  
**Subject:** Updated Biogenic CO2 RM document

Hi Alex, as I mentioned in the note on Friday, we continued to review the document in a few places and decided in the

## Ex. 5 Deliberative Process (DP)

In order to stay on schedule we need to provide the FAR package to OP tomorrow.

Thanks,  
Vera

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 12/18/2019 8:33:39 PM  
**To:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**CC:** Koerber, Mike [Koerber.Mike@epa.gov]; Johnson, Yvonne W (Johnson.Yvonne@epa.gov) [Johnson.Yvonne@epa.gov]; Santiago, Juan [santiago.juan@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** Updated Biogenic CO2 RM document  
**Attachments:** Draft Proposed Biogenic CO2 Rulemaking 12-18-19.docx

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## Ex. 5 Deliberative Process (DP)

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Vera

Vera Kornylak || Acting Associate Director  
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919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 7/12/2019 11:46:54 AM  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Baker, Sarah [baker.sarah@epa.gov]  
**Subject:** Request for blurb on biomass

Hi Cheryl and Sarah: any chance you can pull together a paragraph about status/next steps on biomass today?

Thanks,  
Vera

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Koerber, Mike  
**Sent:** Thursday, July 11, 2019 5:38 PM  
**To:** Mathias, Scott <Mathias.Scott@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Cc:** Long, Pam <Long.Pam@epa.gov>  
**Subject:** RE: Briefings for OAR-IO

Per our discussion the other day on biogenic CO<sub>2</sub>, please send me a blurb about our current thinking (with any schedule information) as soon as possible. I talked with Peter and he really wants to impress upon OAR that we got the message and we are moving as quickly as we can to put out a draft rule. To this end, he wants to make sure that they know what we are planning to do and are supportive. Thanks.

Mike

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 9/3/2019 4:54:52 PM  
**To:** South, Peter [South.Peter@epa.gov]  
**Subject:** FW: AF&PA Discussion on Biogenic CO2\_PSD [Ex. 6 Personal Privacy (PP)]  
**Attachments:** AF&PA Discussion on Biogenic CO2\_PSD [Ex. 6 Personal Privacy (PP)]

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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## Appointment

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**From:** Mathias, Scott [Mathias.Scott@epa.gov]  
**To:** Doster, Brian [Doster.Brian@epa.gov]; Greenglass, Nora [Greenglass.Nora@epa.gov]; Ohrel, Sara [Ohrel.Sara@epa.gov]; Steller, John [Steller.John@epa.gov]; Fawcett, Allen [Fawcett.Allen@epa.gov]; Gunning, Paul [Gunning.Paul@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Baker, Sarah [baker.sarah@epa.gov]; RTP-OAQPS-919-541-4248-AQAD/Phone-Line/RTP-OAQPS-BLDG-C [RTP-OAQPS-919-541-4248-AQAD@epa.gov]  
**CC:** Irving, Bill [Irving.Bill@epa.gov]  
**Subject:** AF&PA Discussion on Biogenic CO2/PSD Ex. 6 Personal Privacy (PP)  
**Location:** WJCS 4232D, RTP-OAQPS-C501A/RTP-OAQPS-BLDG-C/  
**Start:** 9/4/2019 2:00:00 PM  
**End:** 9/4/2019 3:00:00 PM  
**Show Time As:** Tentative

**Recurrence:** (none)

**Purpose:** Discuss with Tim Hunt and other AF&PA associates the Biogenic CO2/PSD rule. AF&PA will meet in DC with OGC and OAP. OAQPS/RTP will be tied in via phone line.

DC POC: John Steller  
RTP POC: Yvonne Johnson

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 9/3/2019 4:43:15 PM  
**To:** South, Peter [South.Peter@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]  
**Subject:** RE: Tomorrow's AF&PA meeting on biomass and ACE

Hi Pete, no I don't think I did anything in lotus notes...

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** South, Peter <[South.Peter@epa.gov](mailto:South.Peter@epa.gov)>  
**Sent:** Tuesday, September 03, 2019 12:28 PM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>  
**Subject:** RE: Tomorrow's AF&PA meeting on biomass and ACE

Thanks (looks like you forwarded the meeting in LotusNotes—can we still access LotusNotes?).

---

**From:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Sent:** Tuesday, September 03, 2019 12:13 PM  
**To:** South, Peter <[South.Peter@epa.gov](mailto:South.Peter@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>  
**Subject:** RE: Tomorrow's AF&PA meeting on biomass and ACE

Done, I forwarded it. I thought I had already done it, but in any event, it's done.

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** South, Peter <[South.Peter@epa.gov](mailto:South.Peter@epa.gov)>  
**Sent:** Tuesday, September 03, 2019 12:04 PM  
**To:** Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Subject:** Tomorrow's AF&PA meeting on biomass and ACE

Hi Juan/Vera,

Scott mentioned AQPD will be participating in a meeting with AF&PA tomorrow. If possible, we'd like Robin (biomass) and Nick (ACE) to attend tomorrow's AF&PA meeting—are you planning to call in from one location? If so, do you mind if SPPD sits in as well?

Thanks.

Pete South  
Associate Director  
Sector Policies and Programs Division (SPPD)  
U.S. EPA  
office: 919 541-5359  
cell: 919 599-7213

Message

---

**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 9/3/2019 4:13:00 PM  
**To:** Dunkins, Robin [Dunkins.Robin@epa.gov]; Hutson, Nick [Hutson.Nick@epa.gov]  
**CC:** South, Peter [South.Peter@epa.gov]  
**Subject:** FW: AF&PA Discussion on Biogenic CO2/PSD [Ex. 6 Personal Privacy (PP)]  
**Attachments:** AF&PA Discussion on Biogenic CO2\_PSD [Ex. 6 Personal Privacy (PP)]

I thought I had already forwarded this to you all, but here it is – a meeting tomorrow w/ AF&PA. They want to talk about the SAB process, the ACE rule, and a rep from the forest service will be attending too.

Vera

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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## Appointment

---

**From:** Mathias, Scott [Mathias.Scott@epa.gov]  
**To:** Doster, Brian [Doster.Brian@epa.gov]; Greenglass, Nora [Greenglass.Nora@epa.gov]; Ohrel, Sara [Ohrel.Sara@epa.gov]; Steller, John [Steller.John@epa.gov]; Fawcett, Allen [Fawcett.Allen@epa.gov]; Gunning, Paul [Gunning.Paul@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Baker, Sarah [baker.sarah@epa.gov]; **Ex. 6 Personal Privacy (PP)** /Phone-Line/RTP-OAQPS-BLDG-C [RTP-  
**Ex. 6 Personal Privacy (PP)**]  
**CC:** Irving, Bill [Irving.Bill@epa.gov]  
**Subject:** AF&PA Discussion on Biogenic CO2/PSD (**Ex. 6 Personal Privacy (PP)**)  
**Location:** WJCS 4232D, RTP-OAQPS-C501A/RTP-OAQPS-BLDG-C/  
**Start:** 9/4/2019 2:00:00 PM  
**End:** 9/4/2019 3:00:00 PM  
**Show Time As:** Tentative

**Recurrence:** (none)

**Purpose:** Discuss with Tim Hunt and other AF&PA associates the Biogenic CO2/PSD rule. AF&PA will meet in DC with OGC and OAP. OAQPS/RTP will be tied in via phone line.

DC POC: John Steller  
RTP POC: Yvonne Johnson

Message

---

**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 8/27/2019 12:15:51 PM  
**To:** Dunkins, Robin [Dunkins.Robin@epa.gov]; Schrock, Bill [Schrock.Bill@epa.gov]  
**Subject:** FW: AF&PA Discussion on Biogenic CO2/PSD Ex. 6 Personal Privacy (PP)  
**Attachments:** AF&PA Discussion on Biogenic CO2\_PSD Ex. 6 Personal Privacy (PP)

FYI if you want to attend.

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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## Appointment

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**From:** Mathias, Scott [Mathias.Scott@epa.gov]  
**To:** Doster, Brian [Doster.Brian@epa.gov]; Greenglass, Nora [Greenglass.Nora@epa.gov]; Ohrel, Sara [Ohrel.Sara@epa.gov]; Steller, John [Steller.John@epa.gov]; Fawcett, Allen [Fawcett.Allen@epa.gov]; Gunning, Paul [Gunning.Paul@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Baker, Sarah [baker.sarah@epa.gov]; F [Ex. 6 Personal Privacy (PP)] /Phone-Line/RTP-OAQPS-BLDG-C [RTP-OAQPS- [Ex. 6 Personal Privacy (PP) ]]  
**CC:** Irving, Bill [Irving.Bill@epa.gov]  
**Subject:** AF&PA Discussion on Biogenic CO2/PSD [Ex. 6 Personal Privacy (PP)]  
**Location:** WJCS 4232D, RTP-OAQPS-C501A/RTP-OAQPS-BLDG-C/  
**Start:** 9/4/2019 2:00:00 PM  
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DC POC: John Steller  
RTP POC: Yvonne Johnson

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 8/31/2018 4:10:52 PM  
**To:** Koerber, Mike [Koerber.Mike@epa.gov]  
**CC:** Wood, Anna [Wood.Anna@epa.gov]; Johnson, Yvonne W (Johnson.Yvonnew@epa.gov) [Johnson.Yvonnew@epa.gov]  
**Subject:** FW: Spring 2018 Semiannual Agenda available

Hi Mike, just wanted to quickly follow up and let you know that we're coordinating with the folks in OAP helping us on the rulemaking to develop an edit to this document you sent. We plan to send something back to you on 9/5, as requested.

Have a good weekend!

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Koerber, Mike  
**Sent:** Tuesday, August 28, 2018 4:32 PM  
**To:** Wood, Anna <Wood.Anna@epa.gov>; Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Eck, Janet <Eck.Janet@epa.gov>; Cozzie, David <Cozzie.David@epa.gov>  
**Cc:** South, Peter <South.Peter@epa.gov>; Lessard, Patrick <Lessard.Patrick@epa.gov>  
**Subject:** FW: Spring 2018 Semiannual Agenda available

AQPD and SPPD: Please take a look at the two attached SAB templates and provide any revisions by COB Wednesday, September 5. Thanks and let me know if you have any questions.

Mike

---

**From:** Hockstad, Leif  
**Sent:** Tuesday, August 28, 2018 4:24 PM  
**To:** Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>  
**Subject:** RE: Spring 2018 Semiannual Agenda available

Mike –

Apologies for the silence recently on the SAB items as things have been moving slowly. The OAR IO approved all 7 of the OAQPS templates under the Spring 2018 reg agenda and we sent them along to the SAB staff office. The expected timing is next month for a SAB Workgroup to meet and review the OAR actions and the templates provided. Prior to that the SAB DFO took a look at the templates and tried to ascertain where the SAB Workgroup might be interested in more information.

The SAB DFO flagged for us that the PSD and Nonattainment NSR: Project Emissions Accounting (2060-AT89); Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review (2060-AT90); Mercury and Air Toxics Standards for Power Plants RTR and Cost Review (2060-AT99); Treatment of Biogenic CO2 Emissions Under the Clean Air Act Permitting Programs (2060-AU03); and General NAAQS Implementation Update Rule (2060-AU10) as possibly needing more information for the SAB Workgroup's consideration.

I took another look myself and thought only the oil and gas action and biogenic CO2 action could maybe have some more details added. I added some comment text in green to both documents in areas that we might be able to provide some more specifics. I attached both documents with a naming convention using their RIN numbers and my initials at the end. If you all think more information might be useful please go ahead and include that, but if not then we can still go with the original templates. Remember that the SAB is very interested any time new science is being used and especially when peer reviews are conducted. This means they also need to be reminded when an action is only a policy action.

The other actions I thought were the best we can provide at this time, but I can send those back to you all if you want to take another look.

In terms of next steps, if you all could perhaps send any revisions or reiterate support for using the original templates by next Wednesday, Sept. 5 that would be a great help. If a revised template is provided I can provide to the OAR IO for review to then get those back to the SAB DFO for his workgroup meeting.

Thanks,  
Leif

P.S. The OAR IO is still working on its response for the SAB letter to the Administrator on the Spring 2017 and Fall 2017 actions.

\*\*\*\*\*

Leif Hockstad  
Office of Air and Radiation - OAPPS  
U.S. Environmental Protection Agency  
Phone: 202 343 9432  
[hockstad.leif@epa.gov](mailto:hockstad.leif@epa.gov)

\*\*\*\*\*

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 8/30/2018 6:29:31 PM  
**To:** Santiago, Juan [Santiago.Juan@epa.gov]; Rao, Raj [Rao.Raj@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**CC:** Johnson, Yvonne W [Johnson.YvonneW@epa.gov]  
**Subject:** RE: Revised slide deck for Anna  
**Attachments:** Biogenic CO2 slide for Annas deck.pptx

Hi All, I made some updates to the biogenic CO2 slide.

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Santiago, Juan  
**Sent:** Thursday, August 30, 2018 2:21 PM  
**To:** Rao, Raj <[Rao.Raj@epa.gov](mailto:Rao.Raj@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Cc:** Johnson, Yvonne W <[Johnson.YvonneW@epa.gov](mailto:Johnson.YvonneW@epa.gov)>  
**Subject:** RE: Revised slide deck for Anna

Attached are the slides with my edits and comments on the NSR slides only. I am looking at what Cheryl sent me separately/next.

Thanks!  
Juan

---

**From:** Rao, Raj  
**Sent:** Tuesday, August 21, 2018 2:57 PM  
**To:** Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Cc:** Johnson, Yvonne W <[Johnson.YvonneW@epa.gov](mailto:Johnson.YvonneW@epa.gov)>  
**Subject:** Revised slide deck for Anna

Cheryl, slides 38 (source agg) and biomass are for you to update. Juan I recommend deleting both the RMRR and the OIAI slides. Made a few edits mainly changing the timing.

Raj

Raj Rao, P.E.  
Group Leader, New Source Review Group,  
Air Quality Policy Division,  
Office of Air Quality Planning and Standards (MD-C504-03)  
US Environmental Protection Agency  
109 TW Alexander Drive  
Research Triangle Park, NC 27709

919-541-5344  
919-541-5509 - Fax

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## Treatment of Biogenic CO<sub>2</sub> Emissions in Permitting

- On April 23, 2018, the EPA Administrator issued a policy statement on the treatment of forest biomass for energy production at stationary sources
  - \* Recognizes the benefits of using managed forest biomass for energy production at stationary sources.
  - \* Signals the Agency's intent to treat managed forest biomass biogenic CO<sub>2</sub> emissions from energy production at stationary sources as carbon neutral in future regulatory actions.
- Policy found at: [https://www.epa.gov/sites/production/files/2018-04/documents/biomass\\_policy\\_statement\\_2018\\_04\\_23.pdf](https://www.epa.gov/sites/production/files/2018-04/documents/biomass_policy_statement_2018_04_23.pdf)
- EPA considering regulatory approaches related to the treatment of biogenic CO<sub>2</sub> emissions from stationary sources.



Vera 8/30/18

### The policy statement:

Is not a scientific determination and does not revise or amend any scientific determinations that EPA has previously made. Does not directly address the treatment of biogenic CO<sub>2</sub> emissions at any particular stationary source or in any specific regulatory context or other EPA program. These changes will be accomplished through the appropriate mechanisms, including, as necessary, a notice of any proposed rulemaking, the basis for such changes, and an opportunity for public comment. Seeks to ensure that biomass from managed forests plays a key role in addressing the energy needs of the U.S., furthering U.S. energy dominance, in an environmentally and economically beneficial way. Does not itself alter sources' obligations with regard to GHGs and CO<sub>2</sub> in any particular regulatory program.

### In the policy, the EPA:

Recognizes the importance of the nation's forest resources and related industries, and the role that biomass can play in renewable energy strategies. States that biomass from forest management activities can provide significant energy, economic, and environmental benefits to the U.S. For example, it can reduce the risk of forest fires, while simultaneously providing an energy source for the electric grid. States that The Consolidated Appropriations Act, 2018 explicitly directed EPA, the Department of Energy and the Department of Agriculture to establish policies that "reflect the carbon neutrality of forest biomass for energy production, provided the use of biomass for energy does not result in the conversion of forested lands to non-forest use." States that this policy is also consistent with Executive Order 13783, Promoting Energy Independence and Economic Growth, which requires executive agencies to review requirements that may hinder domestic energy production. Mentions that the Agency may need to consider the tradeoffs and benefits of different accounting approaches and other practical implementation issues to inform policy choices when assessing biogenic CO<sub>2</sub> emissions from stationary sources and as acknowledged by the SAB.

Recent SAB activity: the SAB is separately continuing its ongoing work regarding biogenic CO<sub>2</sub> emissions. EPA's focus is currently on the context provided by the April 2018 policy memorandum.

Message

---

**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 8/29/2018 7:56:06 PM  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Wood, Anna [Wood.Anna@epa.gov]; Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** RE: SAB draft recommendations report and Chartered SAB Meeting

Yes that's right, and it's been coming for years ...

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Vetter, Cheryl  
**Sent:** Wednesday, August 29, 2018 3:50 PM  
**To:** Wood, Anna <[Wood.Anna@epa.gov](mailto:Wood.Anna@epa.gov)>; Montanez, Jessica <[Montanez.Jessica@epa.gov](mailto:Montanez.Jessica@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Subject:** RE: SAB draft recommendations report and Chartered SAB Meeting

Yes. OAP let us know recently that it was coming, but we didn't know when it would come or what it would say.

Cheryl Vetter  
U.S. Environmental Protection Agency  
OAQPS/AQPD/OPG (C504-03)  
Research Triangle Park, NC 27711  
Phone (919) 541-4391 Fax (919) 541-5509  
Note: Positions or views expressed here do not represent official EPA policy.

---

**From:** Wood, Anna  
**Sent:** Wednesday, August 29, 2018 3:48 PM  
**To:** Montanez, Jessica <[Montanez.Jessica@epa.gov](mailto:Montanez.Jessica@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>  
**Subject:** RE: SAB draft recommendations report and Chartered SAB Meeting

Did we know this was coming—just curious

---

**From:** Montanez, Jessica  
**Sent:** Wednesday, August 29, 2018 3:39 PM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Wood, Anna <[Wood.Anna@epa.gov](mailto:Wood.Anna@epa.gov)>  
**Subject:** FW: SAB draft recommendations report and Chartered SAB Meeting

FYI...

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407  
Note: Positions or views expressed here do not represent official EPA policy.

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---

**From:** Ohrel, Sara  
**Sent:** Wednesday, August 29, 2018 3:23 PM  
**To:** Montanez, Jessica <[Montanez.Jessica@epa.gov](mailto:Montanez.Jessica@epa.gov)>; Greenglass, Nora <[Greenglass.Nora@epa.gov](mailto:Greenglass.Nora@epa.gov)>  
**Cc:** Steller, John <[Steller.John@epa.gov](mailto:Steller.John@epa.gov)>  
**Subject:** FW: SAB draft recommendations report and Chartered SAB Meeting

FYI

An updated SAB draft peer review recommendations report on the 2<sup>nd</sup> draft Biogenic CO2 Framework and a notice for a meeting of the Chartered SAB to discuss this draft report were [posted publicly](#) this afternoon. The draft report is attached and the Chartered SAB meeting is scheduled for September 26, 1-5pm (2 days before the proposed biogenic CO2 early guidance briefing with the Administrator) .

Sara Bushey Ohrel  
Climate Change Division  
U.S. Environmental Protection Agency  
(202) 343-9712  
[ohrel.sara@epa.gov](mailto:ohrel.sara@epa.gov)

\*\*\*deliberative



Message

---

**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 9/14/2018 12:24:45 PM  
**To:** Wood, Anna [Wood.Anna@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]  
**CC:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Brachtl, Megan [Brachtl.Megan@epa.gov]; Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]  
**Subject:** RE: Draft Agenda for Bill W Visit on Wed., 9/19

Hi yes we should be all set on biomass.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Wood, Anna  
**Sent:** Thursday, September 13, 2018 5:10 PM  
**To:** Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>  
**Cc:** Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Brachtl, Megan <[Brachtl.Megan@epa.gov](mailto:Brachtl.Megan@epa.gov)>; Johnson, Yvonne W <[Johnson.Yvonnew@epa.gov](mailto:Johnson.Yvonnew@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Subject:** RE: Draft Agenda for Bill W Visit on Wed., 9/19

I take that back—we are also on for title V petitions rule briefing -part 2, and biomass in addition to SPECS/EPS.

Yvonne—please circle with folks on Monday assuming all is well weather wise. I think we have the biomass and title V petitions and SPeCS and EPS briefing docs essentially prepared.

Stay safe everyone!

---

**From:** Wood, Anna  
**Sent:** Thursday, September 13, 2018 5:06 PM  
**To:** Santiago, Juan <[santiago.juan@epa.gov](mailto:santiago.juan@epa.gov)>  
**Cc:** Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Brachtl, Megan <[Brachtl.Megan@epa.gov](mailto:Brachtl.Megan@epa.gov)>; Johnson, Yvonne W <[johnson.yvonnew@epa.gov](mailto:johnson.yvonnew@epa.gov)>; 'vera kornylak' <[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)>  
**Subject:** FW: Draft Agenda for Bill W Visit on Wed., 9/19

Looks like we are on for next Wednesday – Please let me know if you foresee any issues with doing this given the weather. We are on the hook for SPeCS and EPA presentations.

---

**From:** South, Peter  
**Sent:** Thursday, September 13, 2018 5:03 PM  
**To:** OAQPS SMT1 <[OAQPS\\_SMT1@epa.gov](mailto:OAQPS_SMT1@epa.gov)>; OAQPS SMT2 <[OAQPS\\_SMT2@epa.gov](mailto:OAQPS_SMT2@epa.gov)>  
**Cc:** French, Chuck <[French.Chuck@epa.gov](mailto:French.Chuck@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Rao, Raj <[Rao.Raj@epa.gov](mailto:Rao.Raj@epa.gov)>; Wesson, Karen <[Wesson.Karen@epa.gov](mailto:Wesson.Karen@epa.gov)>; Brachtl, Megan

<[Brachtl.Megan@epa.gov](mailto:Brachtl.Megan@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Ashley, John <[ashley.john@epa.gov](mailto:ashley.john@epa.gov)>; Chappell, Regina <[Chappell.Regina@epa.gov](mailto:Chappell.Regina@epa.gov)>; Cortelyou-Lee, Jan <[Cortelyou-Lee.Jan@epa.gov](mailto:Cortelyou-Lee.Jan@epa.gov)>; Eck, Janet <[Eck.Janet@epa.gov](mailto:Eck.Janet@epa.gov)>; Edwards, Chebryll <[Edwards.Chebryll@epa.gov](mailto:Edwards.Chebryll@epa.gov)>; Hemby, James <[Hemby.James@epa.gov](mailto:Hemby.James@epa.gov)>; Johnson, Yvonne W <[Johnson.Yvonnew@epa.gov](mailto:Johnson.Yvonnew@epa.gov)>; Lessard, Patrick <[Lessard.Patrick@epa.gov](mailto:Lessard.Patrick@epa.gov)>; Long, Pam <[Long.Pam@epa.gov](mailto:Long.Pam@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>; Morales, Mariel <[Morales.Mariel@epa.gov](mailto:Morales.Mariel@epa.gov)>; Riha, Kristin <[Riha.Kristin@epa.gov](mailto:Riha.Kristin@epa.gov)>  
**Subject:** Draft Agenda for Bill W Visit on Wed., 9/19

Bill W, David, Clint, and Alex plan to visit RTP on Wednesday, September 19. I have attached the draft agenda.

For those meetings for which your division is on point, please send me briefing materials by COB Monday, September 17.

Thanks and feel free to call me or Mike with any questions.

Pete South  
OAR/OAQPS/IO  
U.S. EPA  
office: 919 541-5359  
cell: 919 599-7213

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 6/24/2019 12:53:01 PM  
**To:** Schrock, Bill [Schrock.Bill@epa.gov]  
**Subject:** FW: Treatment of Biogenic CO2 emissions at stationary sources  
**Attachments:** Treatment of Biogenic CO2 emissions at stationary sources.ics; Final Wehrum June Briefing Document.docx

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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## Appointment

---

**From:** Wehrum, Bill [Wehrum.Bill@epa.gov]  
**To:** Harlow, David [harlow.david@epa.gov]; Lewis, Josh [Lewis.Josh@epa.gov]; Tsirigotis, Peter [Tsirigotis.Peter@epa.gov]; Koerber, Mike [Koerber.Mike@epa.gov]; Harnett, Bill [Harnett.Bill@epa.gov]; Mathias, Scott [Mathias.Scott@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Baker, Sarah [baker.sarah@epa.gov]; Svendsgaard, Dave [Svendsgaard.Dave@epa.gov]; Spangler, Matthew [Spangler.Matthew@epa.gov]; Srinivasan, Gautam [Srinivasan.Gautam@epa.gov]; Zenick, Elliott [Zenick.Elliott@epa.gov]; Doster, Brian [Doster.Brian@epa.gov]; Greenglass, Nora [Greenglass.Nora@epa.gov]; Krallman, John [krallman.john@epa.gov]; Dunham, Sarah [Dunham.Sarah@epa.gov]; Fawcett, Allen [Fawcett.Allen@epa.gov]; Irving, Bill [Irving.Bill@epa.gov]; Kocchi, Suzanne [Kocchi.Suzanne@epa.gov]; Gunning, Paul [Gunning.Paul@epa.gov]; Steller, John [Steller.John@epa.gov]; Ohrel, Sara [Ohrel.Sara@epa.gov]; Massey, Lana [massey.lana@epa.gov]; Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]; Long, Pam [Long.Pam@epa.gov]  
**CC:** Moran, Robin [moran.robin@epa.gov]; Schwab, Justin [Schwab.Justin@epa.gov]; Leopold, Matt (OGC) [Leopold.Matt@epa.gov]; Grundler, Christopher [grundler.christopher@epa.gov]; Charmley, William [charmley.william@epa.gov]; Simon, Karl [Simon.Karl@epa.gov]; Dominguez, Alexander [dominguez.alexander@epa.gov]

**Subject:** Treatment of Biogenic CO2 emissions at stationary sources

**Location:** WJC - N 5400 + Video with RTP + Ex. 6 Personal Privacy (PP)

**Start:** 6/24/2019 5:00:00 PM

**End:** 6/24/2019 5:45:00 PM

**Show Time As:** Busy

**Recurrence:** (none)

**TO:** Bill Wehrum, David Harlow, Josh Lewis, Peter Tsirigotis, Mike Koerber, Bill Harnett, Scott Mathias, Vera Kornylak, Cheryl Vetter, Sarah Baker, Dave Svendsgaard, Matt Spangler, Gautam Srinivasan, Elliott Zenick, Brian Doster, Nora Greenglass, John Krallman, Sarah Dunham, Allen Fawcett, Bill Irving, Suzanne Kocchi, Paul Gunning, John Stellar, Sara Ohrel

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 7/13/2018 5:48:36 PM  
**To:** Koerber, Mike [Koerber.Mike@epa.gov]  
**CC:** Johnson, Yvonne W (Johnson.Yvonnew@epa.gov) [Johnson.Yvonnew@epa.gov]; Montanez, Jessica [Montanez.Jessica@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** Draft Biomass Update for Alex D 7 13 18.docx  
**Attachments:** Draft Biomass Update for Alex D 7 13 18.docx

Hi Mike:

Attached is the paper we propose to use for Alex D. on Tuesday. Please let us know if you have any feedback. We tried to keep it pretty high level, but also provide some appendix material.

Thanks,  
Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 10/29/2018 2:16:35 PM  
**To:** Tim\_hunt@afandpa.org  
**Subject:** Re: Nov 13 meeting

Hi Tim, thanks for your message and voicemail. I will give you a call later today - the 13th is tight and I was checking on a couple scheduling issues before getting back to you. That said, I appreciate your urgency and I will reach out to you later this morning.

Vera

Vera Kornylak  
OAQPS/AQPD  
919-541-4067  
[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

On Oct 29, 2018, at 9:57 AM, Hunt, Tim <[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)> wrote:

Vera,

I left a message last week whether you and others would be available to meet with me, Paul Noe, and our outside counsel on your efforts to draft a proposed rule on biomass in the context of PSD. Paul and I might be down in RTP that day anyway so it would be very convenient. This is important work you are doing so there is some urgency as well.

Let me know what works. Thanks,

Timothy Hunt  
Senior Director, Air Quality Programs  
AMERICAN FOREST & PAPER ASSOCIATION  
1101 K Street, N.W., Suite 700, Washington, D.C. 20005  
[Tim\\_Hunt@afandpa.org](mailto:Tim_Hunt@afandpa.org)  
202-463-2588  
[www.afandpa.org](http://www.afandpa.org)



<image002.jpg> <image003.jpg><image004.jpg><image005.jpg><image006.jpg>

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 3/1/2019 4:13:45 PM  
**To:** Baker, Sarah [baker.sarah@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**CC:** Spangler, Matthew [Spangler.Matthew@epa.gov]  
**Subject:** RE: Biogenic CO2 Draft Administrator Document  
**Attachments:** Draft Biomas Adminr Update 3 1 19.docx

Hi Sarah: thanks for doing this! Here are a few very high level thoughts on this. I'm thinking maybe more of a "rulemaking update" and then the narrative would flow from that. See what you think of the comments and I'm happy to talk further. I haven't heard anything from Mike on this, maybe Cheryl and I can ask him on Monday since we'll be talking to him about something else.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
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---

**From:** Baker, Sarah  
**Sent:** Wednesday, February 27, 2019 10:06 AM  
**To:** Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>  
**Cc:** Spangler, Matthew <Spangler.Matthew@epa.gov>  
**Subject:** Biogenic CO2 Draft Administrator Document

Attached is a draft briefing paper to help start our discussion of what information we want to convey to the Administrator. Also attached is a revised timeline keeping the same time periods between dates that Jessica set out but with more recent dates. I have not reviewed it with Pam so I'm unsure of its accuracy but it should at least give us an idea of the timeframe. Thanks.

Sarah

Sarah Baker  
Environmental Protection Specialist  
Air Quality Policy Division, Operating Permits Group  
U.S. EPA, Office of Air Quality Planning and Standards  
(919) 541-4846 / [baker.sarah@epa.gov](mailto:baker.sarah@epa.gov)

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 12/7/2018 6:30:10 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** FW: Meeting with NAFO re: biogenic CO2 emissions (CONFIRMED)  
**Attachments:** Fwd Meeting with NAFO re biogenic CO2 emissions (CONFIRMED) .ics

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
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Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 2/26/2019 8:15:50 PM  
**To:** Baker, Kirk [Baker.Kirk@epa.gov]; Terry, Sara [Terry.Sara@epa.gov]  
**Subject:** FW: Fire/FWS Heads up  
**Attachments:** SO 3372.pdf

Kirk, Sara: would you want to participate in a meeting with Tim Allen as discussed below? He's interested in meeting tomorrow or Thursday.

Thanks,  
Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Kornylak, Vera S.  
**Sent:** Monday, February 25, 2019 12:38 PM  
**To:** Koerber, Mike <Koerber.Mike@epa.gov>  
**Cc:** Wood, Anna <Wood.Anna@epa.gov>; Wayland, Richard <Wayland.Richard@epa.gov>; Sasser, Erika <Sasser.Erika@epa.gov>  
**Subject:** Fire/FWS Heads up

Hi Mike: we just became aware of two interesting documents relating to fire work. I'm writing because I want to make sure you're in the loop on these, and also as a heads up that I've sent a note to OID, HEID, and AQAD about updating the fire presentation for the Administrator to include a reference to these documents.

The first document is attached to this message – it's an order from the Secretary of the Interior mainly focused on managing land to avoid catastrophic wildfire and restore post fire, and it mentions a consultation with the EPA. Specifically, it discusses a consult with EPA to "identify and remove fuels management barriers implemented under the CAA and the CWA and report progress to the Deputy Secretary." We found out about it because Tim Allen at the USFS reached out to Anna to ask whether we could set up a call to fulfill the order's consultation directive with the EPA. I am going to work with Tim to set up the meeting – please let me know if you think you might be interested in attending.

The second document, which I saw cited to in the Secretary's order, is an EO issued by the President in Dec. 2018. The link is below:

<https://www.whitehouse.gov/presidential-actions/eo-promoting-active-management-americas-forests-rangelands-federal-lands-improve-conditions-reduce-wildfire-risk/>

This document is notable not only because it mentions the Interior-EPA consultation that Tim reached out to us about, but also because it could possibly be viewed as supporting the biomass regulatory work. Here are a few interesting excerpts from this EO:

- Secretary of the Interior and the Secretary of Agriculture are directed to streamline agency administrative and regulatory processes and policies relating to fuel reduction in forests, rangeland, and other Federal lands and forest restoration when appropriate by:
  - Effective federal agency coordination
  - Adhering to minimum statutory and regulatory time periods, to the maximum extent practicable, for comment, consultation, and administrative review processes related to active management of forests, rangelands, and other Federal lands, including management of wildfire risks
  - Consistent with applicable law, developing and using new categorical exclusions to implement active management of forests, rangelands and other Federal lands
  - Review land designations and policies that may limit active forest management and increase the risk of catastrophic wildfires
  - Consider market conditions as appropriate when preparing timber sales, including biomass and biochar opportunities, and encourage export of these or similar forest-treatment products to the maximum extent permitted by law
  - Develop recommended actions and incentives to expand uses, markets, and utilization of forest products resulting from restoration and fuel reduction projects in forests, rangelands, and other Federal lands, including biomass and small-diameter materials
  - In conjunction with the Administrator of the EPA, identify methods to reduce interagency regulatory barriers, improve alignment of Federal, State, and tribal policy, and identify redundant policies and procedures to promote efficiencies in implementing the CWA, CAA, and other applicable Federal environmental laws.

I just wanted to give you a heads up on this so you can expect an edit to the fire presentation, and also, I'll let you know about the meeting with Tim.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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Message

---

**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 11/19/2018 3:54:09 PM  
**To:** Lessard, Patrick [Lessard.Patrick@epa.gov]; McKinney, Voronina [mckinney.voronina@epa.gov]  
**CC:** Wood, Anna [Wood.Anna@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Massey, Lana [massey.lana@epa.gov]  
**Subject:** FYI - for today's AF&PA Meeting  
**Attachments:** Agenda for EPA-AFPA-AWC on Biogenic Emissions final 11-19-18.docx

Hi Patrick and Nina; since Peter may be calling into today's meeting with AF&PA, I wanted to be sure you had the attached agenda (from AF&PA).

In addition, here's our plan for the "EPA Update" portion of the agenda:

-I'll open it up and Cheryl will cover some recent NSR activities that we think are helpful for AF&PA members even though they do not directly address biogenic CO2 emissions. I anticipate, but am waiting on OAP confirmation, that they will cover the November 1 EPA letter to the Hill. If not, I will cover that. Then we would pivot to Peter/Anna to say a few words about biogenic CO2 specifically.

-That will conclude the EPA update and I'll pass the floor to AF&PA.

Do you have a sense of whether Peter will be on the phone at the beginning as previously planned and for how long?

Thanks,  
Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 2/25/2019 2:48:28 PM  
**To:** Baker, Sarah [baker.sarah@epa.gov]; Spangler, Matthew [Spangler.Matthew@epa.gov]  
**CC:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** Interesting EO from Dec. 2018

Sarah and Matt:

I just came across an EO signed by the President in Dec. 2018 that has some interesting and (I think) noteworthy biomass language. Once you read through it, we should probably make sure OAP and OGC are aware of it. I don't think it changes anything except to say that it certainly doesn't seem to oppose any regulatory approach we've been discussing. I'm eager to hear your observations as well.

The document is available at:

<https://www.whitehouse.gov/presidential-actions/eo-promoting-active-management-americas-forests-rangelands-federal-lands-improve-conditions-reduce-wildfire-risk/>

Here are some interesting tidbits:

- Secretary of the Interior and the Secretary of Agriculture are directed to streamline agency administrative and regulatory processes and policies relating to fuel reduction in forests, rangeland, and other Federal lands and forest restoration when appropriate by (**emphasis added below**):
  - Effective federal agency coordination
  - Adhering to minimum statutory and regulatory time periods, to the maximum extent practicable, for comment, consultation, and administrative review processes related to active management of forests, rangelands, and other Federal lands, including management of wildfire risks
  - Consistent with applicable law, developing and using new **categorical exclusions** to implement active management of forests, rangelands and other Federal lands
  - Review land designations and policies that may limit active forest management and increase the risk of catastrophic wildfires
  - Consider market conditions as appropriate when preparing timber sales, **including biomass** and biochar opportunities, and encourage export of these or similar forest-treatment products to the maximum extent permitted by law
  - Develop recommended actions and incentives to expand uses, markets, and utilization of forest products resulting from restoration and fuel reduction projects in forests, rangelands, and other Federal lands, **including biomass** and small-diameter materials
  - **In conjunction with the Administrator of the EPA, identify methods to reduce interagency regulatory barriers, improve alignment of Federal, State, and tribal policy, and identify redundant policies and procedures to promote efficiencies in implementing the CWA, CAA, and other applicable Federal environmental laws.**

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 1/31/2019 2:02:44 AM  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**CC:** Baker, Sarah [baker.sarah@epa.gov]; Spangler, Matthew [Spangler.Matthew@epa.gov]  
**Subject:** Re: QFR on biomass

Looks fine to me, I agree.

Vera Kornylak  
OAQPS/AQPD  
919-541-4067  
[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

On Jan 30, 2019, at 5:12 PM, Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)> wrote:

We don't think it needs any changes – it seems sufficiently vague. What do you think?

Cheryl Vetter  
U.S. Environmental Protection Agency  
OAQPS/AQPD/OPG (C504-03)  
Research Triangle Park, NC 27711  
Phone (919) 541-4391 Fax (919) 541-5509  
Note: Positions or views expressed here do not represent official EPA policy.

---

**From:** Kornylak, Vera S.  
**Sent:** Wednesday, January 30, 2019 4:56 PM  
**To:** Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>  
**Cc:** Baker, Sarah <[baker.sarah@epa.gov](mailto:baker.sarah@epa.gov)>; Spangler, Matthew <[Spangler.Matthew@epa.gov](mailto:Spangler.Matthew@epa.gov)>  
**Subject:** Re: QFR on biomass

Thanks for sending that!

Vera Kornylak  
OAQPS/AQPD  
919-541-4067  
[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

On Jan 30, 2019, at 4:13 PM, Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)> wrote:

Here is what EPA said in response to Senator Shelby's (Alabama?) Question for the Record (QFR) from Wheeler's confirmation hearing.

**Senator Shelby:**

159. The Consolidated Appropriations Act of 2018 included language directing the Secretaries of Energy and Agriculture and the Administrator of the Environmental Protection Agency to establish clear and simple policies that reflect the carbon-neutrality of forest bioenergy and recognize biomass as a renewable energy source provided the use of forest biomass does not cause the conversion of forests to non-forest use. I appreciate the EPA issuing guidance in April 2018 stating that future EPA regulatory actions for energy production from stationary sources will recognize

biomass from managed forests as carbon neutral. I also appreciate the tri-agency statement in October 2018 affirming these principles.

Mr. Wheeler, would please provide an update on the EPA's progress towards implementing a regulation on carbon neutrality of biomass?

**EPA staff have made an in-depth assessment of the various options available for moving forward, including the potential for issuing guidance under the Prevention of Significant Deterioration (PSD) permitting program that would, on a site-specific basis where appropriate, recognize the use of biomass feedstocks as Best Available Control Technology (BACT). Longer-term, EPA is assessing the value of undertaking a rulemaking in this area. If undertaken, EPA estimates that a proposed rule could be developed by the end of this year.**

Cheryl Vetter

U.S. Environmental Protection Agency

OAQPS/AQPD/OPG (C504-03)

Research Triangle Park, NC 27711

Phone (919) 541-4391 Fax (919) 541-5509

Note: Positions or views expressed here do not represent official EPA policy.

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 6/20/2019 7:46:29 PM  
**To:** Dunkins, Robin [Dunkins.Robin@epa.gov]  
**Subject:** FW: Treatment of Biogenic CO2 emissions at stationary sources  
**Attachments:** Treatment of Biogenic CO2 emissions at stationary sources.ics

Vera Kornylak || Acting Associate Director  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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## Appointment

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**From:** Wehrum, Bill [Wehrum.Bill@epa.gov]  
**To:** Harlow, David [harlow.david@epa.gov]; Lewis, Josh [Lewis.Josh@epa.gov]; Tsirigotis, Peter [Tsirigotis.Peter@epa.gov]; Koerber, Mike [Koerber.Mike@epa.gov]; Harnett, Bill [Harnett.Bill@epa.gov]; Mathias, Scott [Mathias.Scott@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Baker, Sarah [baker.sarah@epa.gov]; Svendsgaard, Dave [Svendsgaard.Dave@epa.gov]; Spangler, Matthew [Spangler.Matthew@epa.gov]; Srinivasan, Gautam [Srinivasan.Gautam@epa.gov]; Zenick, Elliott [Zenick.Elliott@epa.gov]; Doster, Brian [Doster.Brian@epa.gov]; Greenglass, Nora [Greenglass.Nora@epa.gov]; Krallman, John [krallman.john@epa.gov]; Dunham, Sarah [Dunham.Sarah@epa.gov]; Fawcett, Allen [Fawcett.Allen@epa.gov]; Irving, Bill [Irving.Bill@epa.gov]; Kocchi, Suzanne [Kocchi.Suzanne@epa.gov]; Gunning, Paul [Gunning.Paul@epa.gov]; Steller, John [Steller.John@epa.gov]; Ohrel, Sara [Ohrel.Sara@epa.gov]; Massey, Lana [massey.lana@epa.gov]; Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]; Long, Pam [Long.Pam@epa.gov]  
**CC:** Moran, Robin [moran.robin@epa.gov]; Schwab, Justin [Schwab.Justin@epa.gov]; Leopold, Matt (OGC) [Leopold.Matt@epa.gov]; Grundler, Christopher [grundler.christopher@epa.gov]; Charmley, William [charmley.william@epa.gov]; Simon, Karl [Simon.Karl@epa.gov]  
**Subject:** Treatment of Biogenic CO2 emissions at stationary sources  
**Location:** WJC - N 5400 + Video with RTP + Ex. 6 Personal Privacy (PP)  
**Start:** 6/24/2019 5:00:00 PM  
**End:** 6/24/2019 5:45:00 PM  
**Show Time As:** Busy  
  
**Recurrence:** (none)

**TO:** Bill Wehrum, David Harlow, Josh Lewis, Peter Tsirigotis, Mike Koerber, Bill Harnett, Scott Mathias, Vera Kornylak, Cheryl Vetter, Sarah Baker, Dave Svendsgaard, Matt Spangler, Gautam Srinivasan, Elliott Zenick, Brian Doster, Nora Greenglass, John Krallman, Sarah Dunham, Allen Fawcett, Bill Irving, Suzanne Kocchi, Paul Gunning, John Stellar, Sara Ohrel

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 5/14/2019 3:01:17 PM  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** Re: Biomass

I wasn't there. These are SPPD's notes

Vera Kornylak  
OAQPS/AQPD  
919-541-4067  
kornylak.vera@epa.gov

> On May 14, 2019, at 10:41 AM, Vetter, Cheryl <Vetter.Cheryl@epa.gov> wrote:  
>  
> Go ahead, if you heard it the first time – it would be more consistent for you to say it.  
>  
> Cheryl Vetter  
> U.S. Environmental Protection Agency  
> OAQPS/AQPD/OPG (C504-03)  
> Research Triangle Park, NC 27711  
> Phone (919) 541-4391 Fax (919) 541-5509  
> Note: Positions or views expressed here do not represent official EPA policy.  
>  
> From: Kornylak, Vera S.  
> Sent: Tuesday, May 14, 2019 10:30 AM  
> To: Vetter, Cheryl <Vetter.Cheryl@epa.gov>  
> Subject: FW: Biomass  
>  
> FYI see below and plan to say same thing– do you want to be the official speaker?  
>  
> Vera Kornylak || Acting Associate Director  
> Air Quality Policy Division || OAQPS  
> 919-541-4067 || kornylak.vera@epa.gov<mailto:kornylak.vera@epa.gov>  
>  
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>  
> From: Mathias, Scott  
> Sent: Tuesday, May 14, 2019 10:23 AM  
> To: Kornylak, Vera S. <Kornylak.Vera@epa.gov<mailto:Kornylak.Vera@epa.gov>>  
> Subject: Biomass  
>  
> For AFPA. Peter says we're doing rule with possible proposal by end of year. See notes below.  
> [image1.jpeg]  
> Scott Mathias | Acting Director, Air Quality Policy Division | RTP, NC | 919.541.5310  
> <image001.jpg>

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 5/8/2018 12:52:20 PM  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** Re: AF&PA to be here at RTP Wednesday. would you like staff to attend?

Switch works for me - actually it's better. Not sure if this is still an option but wanted to let you know.

Vera

Vera Kornylak  
OAQPS/AQPD  
919-541-4067  
[kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

On May 7, 2018, at 5:05 PM, Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)> wrote:

<image002.gif>

Any chance we could switch the order? Raj and I (and our key staff people) will be on the APM call starting at 2. There is a good chance that we could be done by 3.

Cheryl Vetter  
U.S. Environmental Protection Agency  
OAQPS/AQPD/OPG (C504-03)  
Research Triangle Park, NC 27711  
Phone (919) 541-4391 Fax (919) 541-5509  
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**From:** Johnson, Yvonne W  
**Sent:** Monday, May 07, 2018 3:52 PM  
**To:** Brachtl, Megan <[Brachtl.Megan@epa.gov](mailto:Brachtl.Megan@epa.gov)>; Jones, Rhea <[Jones.Rhea@epa.gov](mailto:Jones.Rhea@epa.gov)>; Rao, Raj <[Rao.Raj@epa.gov](mailto:Rao.Raj@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>  
**Cc:** Wood, Anna <[Wood.Anna@epa.gov](mailto:Wood.Anna@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Ling, Michael <[Ling.Michael@epa.gov](mailto:Ling.Michael@epa.gov)>; Mathias, Scott <[Mathias.Scott@epa.gov](mailto:Mathias.Scott@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>  
**Subject:** AF&PA to be here at RTP Wednesday. would you like staff to attend?

AF&PA will be here on Wednesday. Currently, it is shown on the calendars of those noted below. GLs, if you would like someone from your staff to attend in your place or along with you please let me know.

**2 to 4 PM Meet with AQPD & AQAD**

- **2:00 – 3:00 (invited Anna, Juan, Raj, Cheryl)**
  - Biomass rulemaking – schedule, scope, rationale
  - NSR/PSD Improvements – ambient air, project aggregation, RMRR, PALs, others
  - SSM SIP Call

- **3:00 – 4:00 (invited Anna, Michael, Scott, Vera, Megan, Rhea)**
  - NAAQS implementation improvements – international transport, 126 petitions, non-attainment designations for ozone, offset policies, other issues from 4/12 Presidential memo
  - Regional Haze
  - Any other issues identified by EPA or AF&PA/AWC

---

Thank you,

***Yvonne W. Johnson***

Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
[johnson.yvonne@epa.gov](mailto:johnson.yvonne@epa.gov)

Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 4/24/2019 3:01:44 PM  
**To:** Baker, Sarah [baker.sarah@epa.gov]  
**Subject:** FW: AF&PA Meeting (PSD Biomass)  
**Attachments:** AF&PA Meeting (PSD Biomass).ics

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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## Appointment

---

**From:** Johnson, Yvonne W [Johnson.YvonneW@epa.gov]  
**To:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**CC:** Mathias, Scott [Mathias.Scott@epa.gov]; Rao, Raj [Rao.Raj@epa.gov]

**Subject:** AF&PA Meeting (PSD Biomass)  
**Location:** C-111C

**Start:** 5/14/2019 3:00:00 PM  
**End:** 5/14/2019 3:30:00 PM  
**Show Time As:** Busy

**Recurrence:** (none)

Purpose: AF&PA (Time Hunt and others) will be here in RTP and want to discuss the PSD biomass rule.

Message

---

**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 7/25/2017 1:13:42 PM  
**To:** Johnson, Yvonne W (Johnson.Yvonnew@epa.gov) [Johnson.Yvonnew@epa.gov]  
**CC:** Wood, Anna [Wood.Anna@epa.gov]  
**Subject:** Overview of AFPA.docx  
**Attachments:** Overview of AFPA.docx

Hi Yvonne, I made the edit Anna just requested to this doc. Thanks.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 7/24/2017 8:17:19 PM  
**To:** Wood, Anna [Wood.Ann@epa.gov]  
**Subject:** RE: AF&PA background  
**Attachments:** Overview of AFPA.docx

Anna, here's what I developed – hope this helps. Happy to revise if necessary.

Vera

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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---

**From:** Wood, Anna  
**Sent:** Monday, July 24, 2017 1:55 PM  
**To:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>  
**Subject:** RE: AF&PA background

I think this is good, can we add an upfront purpose of document and key messages to make it look more of a complete one pager (though I know they only asked for a half-pager). So the doc would have a Purpose, Key Messages and Background section re recommendations from AFPA to modernize permitting. I was surprised that they did not include anything re carbon neutrality for permitting. Let me know what you think, thx

---

**From:** Kornylak, Vera S.  
**Sent:** Monday, July 24, 2017 1:31 PM  
**To:** Wood, Anna <[Wood.Ann@epa.gov](mailto:Wood.Ann@epa.gov)>  
**Subject:** AF&PA background

Hi Anna: per the request from this morning re: ½ page on 'modernization' of permitting from AF&PA perspective, I can share some information from our meeting with them in May 2017.

- AF&PA submitted substantial comments on the permit streamlining Dept. of Commerce docket. During a May 2017 meeting with OAQPS, AF&PA offered the following key goals associated with their comments.
  - Reduce the number of projects triggering PSD
  - Ensuring that US industry is able to compete globally – permitting slows down business decisions that impact global competitiveness
  - Increasing certainty around permitting decisions
  - Eager to dialogue about these issues
- AF&PA also separately submitted to OAQPS during the May 2017 meeting, a list of streamlining efforts in an order of priority. AF&PA split up actions into different categories such as Applicability/NSR Reforms and Streamlining Air Permitting. In addition, AF&PA provided a table like a gantt chart which highlights potential timing for its suggested actions, along with dollar signs to indicate level of importance (i.e., more dollar signs suggests the project would have a greater economic benefit for sources).
- For Applicability/NSR Reforms, here is the AF&PA list in order of importance



- Project netting – AF&PA identified guidance and regulatory options for addressing this issue.
- Aggregation – less constraining approaches
  - Would really help with certainty issues – prefer regulatory approach
- Plantwide applicability limits – no ratcheting after 10 years (i.e., no review)
  - Regulatory options and would like a proposal in 2017 and final action in 2018
- Debottlenecking – finalize 2006 proposal
- Offsets for rural areas
- Simplify PSD test – “maximum hourly emission rate”
- Clean Unit exemption
- Pollution Control Project exclusion
- Significant Emission Rate applicability thresholds
- BACT test – not redefine the source
- For Streamlining Air Permitting the list was fairly long, but key priorities include:
  - State discretion – give states a greater role to determine appropriate assumptions such as receptor locations
  - Probabilistic Risk Assessment – no clear ask regarding an EPA report from July 2014
  - Ambient air and receptors – guidance (very important)
  - Emissions variability – regulation
  - Background air – regulation and guidance
  - Intermittent sources – guidance and regulation
  - PM emissions – take actions to limit impacts of small sources of PM as driving increment analysis
  - Modeling improvements
  - SILs and MERPS ...and others

Vera Kornylak || Senior Policy Advisor  
 Air Quality Policy Division || OAQPS  
 919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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## Overview of AF&PA Permit Streamlining Feedback

**Purpose:** provide information regarding feedback on permit streamlining (“modernization”) from American Forest and Paper Association (AF&PA) in advance of meeting with OAR on July 27, 2017.

### Key Messages

- AF&PA submitted comments on the permit streamlining Dept. of Commerce docket covering a wide array of suggestions to streamline Clean Air Act (CAA) permitting. AF&PA explained its position that the permitting program needs a substantial re-evaluation across the board, and provided key details on what, how, and when to complete suggested changes.
- During a May 2017 meeting with OAQPS, AF&PA offered the following goals associated with their comments.
  - Reduce the number of projects triggering PSD;
  - Ensure that US industry is able to compete globally; and
  - Increase certainty around permitting decisions
- AF&PA also indicated its interest in continued discussions regarding these issues.

### Background

- During a May 2017 meeting at OAQPS, AF&PA provided a list of streamlining efforts in an order of priority. AF&PA split up actions into two categories: Applicability/NSR Reforms and Streamlining Air Permitting.
- The broader Dept. of Commerce comments include a long list of recommended changes to regulations, including finalizing the GHG SER rule to include language recognizing the carbon neutrality of biomass. For purposes of “modernizing” air permitting, AF&PA seems to focus on the following more condensed list of actions.
- For Applicability/NSR Reforms, here are AF&PA’s priority projects:
  - Project netting – guidance and regulatory options for addressing this issue.
  - Aggregation – less constraining approaches overall
    - Would really help with certainty issues – prefer regulatory approach
  - Plantwide applicability limits – no ratcheting after 10 years (i.e., no review)
    - Regulatory options and would like a proposal in 2017 and final action in 2018
  - Debottlenecking – finalize 2006 proposal
  - Offsets for rural areas
  - Simplify PSD test – “maximum hourly emission rate”
  - Clean Unit exemption
  - Pollution Control Project exclusion
  - Significant Emission Rate applicability thresholds
  - BACT test – not redefine the source
- For Streamlining Air Permitting, key priorities include:  
*(note: this list was fairly long so only the first part of the list is included here)*
  - State discretion – give states a greater role to determine appropriate assumptions such as receptor locations
  - Ambient air and receptors – guidance
  - Emissions variability – regulation
  - Background air – regulation and guidance
  - Intermittent sources – guidance and regulation
  - Modeling improvements, SILs and MERPS

Message

---

**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 8/30/2017 1:16:27 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** RE: INSIDE EPA: Seeking Second Rewrite, Split SAB Again Rejects Advice On Biomass CO2

Thanks Jessica.

Vera Kornylak || Senior Policy Advisor  
Air Quality Policy Division || OAQPS  
919-541-4067 || [kornylak.vera@epa.gov](mailto:kornylak.vera@epa.gov)

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**From:** Montanez, Jessica  
**Sent:** Wednesday, August 30, 2017 8:53 AM  
**To:** Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>; Wood, Anna <[Wood.Anna@epa.gov](mailto:Wood.Anna@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Rao, Raj <[Rao.Raj@epa.gov](mailto:Rao.Raj@epa.gov)>; Wheeler, Carrie <[Wheeler.Carrie@epa.gov](mailto:Wheeler.Carrie@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>  
**Subject:** INSIDE EPA: Seeking Second Rewrite, Split SAB Again Rejects Advice On Biomass CO2

**I listened to this SAB review, I can tell you more details if interested...**

---

## Seeking Second Rewrite, Split SAB Again Rejects Advice On Biomass CO2

August 29, 2017

For the second time in less than two years, EPA's Science Advisory Board (SAB) has again rejected draft advice from a special panel on how the agency should estimate carbon dioxide emissions from biomass power, deciding to revise language addressing the time frame over which emissions impacts are measured, an issue that has long stymied the effort.

The new revisions will be led by SAB members working with the panel, rather than the recent revision that was led by the panel working with four SAB reviewers.

But whether the new review will be completed before several key SAB and biomass panel members depart their positions next month is raising doubts about whether the next SAB will even seek to reach consensus on the issue.

For example, the current SAB Chair, Peter Thorne of the University of Iowa, as well as the biomass panel chair Madhu Khanna of the University of Illinois, are slated to end their tenures at the end of next month.

As such, the latest revision is likely to continue the uncertainty that has long plagued EPA efforts to develop a method for estimating life-cycle CO2 emissions from biomass. And while there is significant uncertainty over the Trump EPA's approach to greenhouse gas

regulation for stationary sources, SAB members noted that the biogenic CO2 issue will arise again and that it is important to have a strong report in the record for when it does.

While the chartered SAB eventually decided Aug. 29 to make a second round of revisions -- after EPA already revised its original draft biomass accounting framework that is under review after initial SAB panel criticism dating back years -- the decision came only after board members rejected an initial proposal to scrap the entire effort due to lack of consensus.

However, that approach, first suggested by lead reviewer William Schlesinger of the Cary Institute of Ecosystem Studies, was ultimately rejected because it would be an unprecedented action that failed to follow the board's approved criteria for reviewing panelists' work.

Rather than kill the effort entirely, the board voted unanimously to have the SAB lead the new revision, an approach that was offered by SAB member Gina Solomon of the California EPA.

The full SAB in March 2016 first reviewed the panel's draft report that seeks to establish a biogenic accounting factor (BAF) for determining how to discount CO2 emissions at the smokestack based on regrowth and re-sequestration of emissions.

The full SAB rejected the first draft and four lead reviewers have spent the past 17 months working with the panel to revise it.

The first indication that the board and the panel were still at odds came last week when documents posted on SAB's website ahead of the meeting indicated that the chartered SAB appears to continue to share environmentalists' concern that the approach favored by the biomass panel for estimating releases over long time periods is not adequate in all cases.

#### **'No Justification'**

Industry groups and the special panel generally favor an approach that estimates emissions over longer periods of time to account for the full carbon-related effects from changes to biomass use and demand. If biomass demand increases, they argue, that will spur more landowners to plant more forests that will eventually sequester enough carbon to offset near-term emission increases.

But environmentalists note that smokestack CO2 from biomass power is much higher than coal, and that assuming forest regrowth will occur over many decades is too speculative. As such, they favor a shorter time frame that would limit the amount or types of biomass that could be used in any EPA GHG policy for stationary sources.

During the Aug. 29 meeting, most members of the full SAB disagreed with the panel's recommendation that the accounting time frame should be at the place in time where 95 percent of the positive and negative effects of the biomass are at equilibrium.

Khanna, the biomass panel chair, sought to reject SAB members' concerns that the approach inherently meant a longer time frame that would ignore early emissions, and said the time frame could be long or short depending on a number of factors.

She added that setting a BAF at any other point in time would result in either overestimating or underestimating the impacts, both positive and negative ones, meaning the result would be incorrect.

However, lead reviewer Steve Hamburg of Environmental Defense Fund said that approach did not comport with science and would miss early emissions by treating them as fundamentally different than fossil fuel emissions — a point Khanna later said was correct because biomass is different from coal or gas.

Hamburg countered by saying that CO<sub>2</sub> is accounted for when deforestation occurs, when the atmosphere receives a vast uptake of emissions that can take 150 years to re-sequester.

“If we use the longer-term scenarios we would be ignoring CO<sub>2</sub> like it doesn't exist in the atmosphere because in some case in the future it will be retaken up” but in many cases that is “100 years from now,” he said. That is “not consistent with how we do carbon accounting. There is no justification.”

He also noted that each GHG policy, such as the Paris Agreement, the Regional Greenhouse Gas Initiative and California laws all have time frames — though EPA required the BAF to be policy neutral from the outset.

Hamburg added that the accounting system should be time neutral. “I cannot at this time support the report as it is written. It is scientifically wrong. . . . I would recommend this report not be accepted as is.”

Khanna sought to explain that the time horizon must be long enough to account for 95 percent of the changes in terrestrial carbon stock from all feedstocks in order to have the most accurate accounting but she also noted that the BAF would be on a curve over time, and could be either positive or negative. She rejected the idea of adjusting the value each year as too cumbersome.

Truncating the time frame would either underestimate or overestimate the impacts before equilibrium, and a focus on the short term would be inconsistent with other measures of climate impacts such as the social cost of carbon, she added.

### **'Rush To Judgment'**

Other lead SAB reviewers, however, were not swayed. Schlesinger said he did not see any reason to “rush to judgment” and that he did not think the report as written helped to clarify the controversial science.

“It would be really unfortunate to have this in the file in its current state even if the issue is swept under the table for the next two or three years. Eventually this will pop back up and for this report to be the only presumed scientific assessment at the time, given its lack of transparency and confused writing would be an unfortunate thing to have left behind,” he said.

After the discussion, the first suggestion was for the final report to express dissent over the time frame, be approved and sent to EPA.

However, Hamburg rejected that approach, saying, “I don't think we do society any benefit by kicking [the time frame] into 'on the one hand, and on the other hand' . . . . I think we say we could not reach consensus.”

Lead reviewer Jeanne VanBriesen of Carnegie Mellon concurred and noted that it would be problematic if the panel's recommendation — that the time frame had to be at near equilibrium or it would be incorrect — stood, because that would set a high bar preventing any policymaker from choosing a different time frame.

She also noted that if SAB voted to accept the panel's report, then the report would become the board's, and so “it is critically important that we be standing behind the” panel's conclusions.

Solomon's motion was for the board chair and lead reviewers to work in consultation with Khanna to "substantively revise" the executive summary, letter to the EPA administrator "and insofar as feasible the body of the report, recognizing that the latter is a large undertaking."

The motion also said the final report would have to come back before the full board for a vote though it set no deadline for that to occur.

-- Dawn Reeves ([dreevs@iwpnews.com](mailto:dreevs@iwpnews.com))

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407, Fax: 919-541-5509  
Note: Positions or views expressed here do not represent official EPA policy.

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Message

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**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 4/10/2017 4:42:32 PM  
**To:** Johnson, Yvonne W (Johnson.Yvonnew@epa.gov) [Johnson.Yvonnew@epa.gov]  
**Subject:** Draft AQPD List of 13777 Projects.docx  
**Attachments:** Draft AQPD List of 13777 Projects.docx

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April 10, 2017

EO 13777 Burden Reducing Options Air Quality Policy Division

| Group | Rule or Program Area | Stakeholder Request or Burden Reduction Option | Potential Response | Category* | Notes |
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| Group | Rule or Program Area                   | Stakeholder Request or Burden Reduction Option | Potential Response | Category* | Notes |
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| G     | <b>Ex. 5 Deliberative Process (DP)</b> |  |                    |           |       |
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|       |                      | submit “maintenance SIPs” after an area has clean data and is redesignated to attainment. |                    |           |       |

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|--|----------------------|---|--------------------|-----------|-------|
|  |                      | sources report such emissions on a quarterly basis. |                    |           |       |
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| Ex. 5 Deliberative Process (DP) |                      |   |   |           |   |
| OPG                             | Title V Permitting   | <b>Biomass:</b> Clarify the treatment of biogenic CO <sub>2</sub> emissions in permitting | Determining whether biogenic CO <sub>2</sub> is to be counted in assessing emissions from stationary sources is important to certain industries, particularly in the wood products/pulp and paper sector. A decision could be announced through guidance or rulemaking. | 2         | Determining how to address biogenically-derived CO <sub>2</sub> emissions is part of regulating the pollutant. Making a determination on how to address these emissions could be a burden reduction for certain industries. |
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## **EO 13777 Burden Reducing Options Air Quality Policy Division**

\*What is the appropriate category:

1. Are there existing **rules, regulations, and/or guidance documents** for which there are elements or entire sections about which you have heard specific complaints (e.g., unnecessarily excessive or redundant) from stakeholders and for which there are known solutions within the bounds of the Clean Air Act that would make them less burdensome?
2. Which existing **regulations – or parts of regulations** – have stakeholders asked to have repealed, replaced, or modified for which there are solutions within the bounds of the Clean Air Act to make them less burdensome? Particular parts of regulations of interest could include emission measurements and reporting requirements, and analysis or demonstration requirements.
3. Are there **requirements in any regulations** that could be repealed, replaced or modified, within the bounds of the Clean Air Act, that would make them less burdensome? For example, recent agency rule effectiveness efforts may have identified possible actions or opportunities for reducing burden.

Appointment

---

**From:** Kornylak, Vera S. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31C615BDFDB743F1A88FA7EF4137AF38-KORNYLAK, VERA]  
**Sent:** 12/6/2019 2:00:21 PM  
**To:** Long, Pam [Long.Pam@epa.gov]  
**Subject:** Accepted: Tentative Hold - FAR Meeting - Proposed Rule: Treatment of Forest Biogenic CO2 Emissions under the Clean Air Act Permitting (RTP Room C500C; D.C Room 5530; call in  
**Location:** RTP-C500C-Max20/RTP-Bldg-C; HQ-Room-WJCN-5530-50pp Ex. 6 Personal Privacy (PP)  
**Start:** 1/15/2020 7:00:00 PM  
**End:** 1/15/2020 8:00:00 PM  
**Show Time As:** Busy



Appointment

---

**From:** Wood, Anna [Wood.Ann@epa.gov]  
**Sent:** 12/4/2018 10:28:29 PM  
**To:** Kornylak, Vera S. [Kornylak.Vera@epa.gov]  
**Subject:** Fwd: Meeting with NAFO re: biogenic CO2 emissions (CONFIRMED)  
**Attachments:** CONFIRMED RE Meeting request.eml; ATT00001.htm  
**Location:** WJC - N 5400 + video with RTP + Ex. 6 Personal Privacy (PP)

**Start:** 12/10/2018 9:00:00 PM  
**End:** 12/10/2018 9:45:00 PM  
**Show Time As:** Tentative

Hi- please plan on joining this if you can make it- Juan, you are off the hook. I will see if we can include Jessica - Thx

Sent from my iPhone

Begin forwarded message:

**From:** "Wehrum, Bill" <Wehrum.Bill@epa.gov>  
**To:** "Tsirigotis, Peter" <Tsirigotis.Peter@epa.gov>, "Koerber, Mike" <Koerber.Mike@epa.gov>, "Wood, Anna" <Wood.Ann@epa.gov>, "Santiago, Juan" <Santiago.Juan@epa.gov>, "Dunham, Sarah" <Dunham.Sarah@epa.gov>, "Gunning, Paul" <Gunning.Paul@epa.gov>  
**Subject:** Meeting with NAFO re: biogenic CO2 emissions (CONFIRMED)

TO: Bill Wehrum, Peter Tsirigotis, Mike Koerber, Anna Wood, Juan Santiago, Sarah Dunham, Paul Gunning

Meeting attendees (in person):

- Dave Tenny, NAFO
- Chip Murray, NAFO
- Sam Boxerman, Sidley Austin LLP (outside counsel for NAFO)
- Russ Frye, FryeLaw PLLC (outside counsel to Packaging Corporation of America)

Message

---

**From:** Rakosnik, Delaney [rakosnik.delaney@epa.gov]  
**Sent:** 11/30/2018 3:36:24 PM  
**To:** Boxerman, Samuel B. [sboxerman@sidley.com]  
**CC:** Atkinson, Emily [Atkinson.Emily@epa.gov]; Lewis, Josh [Lewis.Josh@epa.gov]  
**Subject:** CONFIRMED RE: Meeting request

Dear Sam,

You are confirmed for a 45 min meeting with Bill Wehrum on 12/10, starting at 4pm.  
Directions and procedures to 1200 Pennsylvania Avenue NW:

Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

Security Procedures: A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. If you are a foreign national entering on a non-US passport, please let us know in advance, as there is a separate clearance process.

Upon arrival, let the guards know that you were instructed to call 202-564-7404 for a security escort. Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Many thanks,

Delaney Rakosnik  
Staff Assistant  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406A, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-2229  
Email: [rakosnik.delaney@epa.gov](mailto:rakosnik.delaney@epa.gov)

---

**From:** Boxerman, Samuel B. <sboxerman@sidley.com>  
**Sent:** Thursday, November 29, 2018 6:12 PM  
**To:** Rakosnik, Delaney <rakosnik.delaney@epa.gov>  
**Subject:** RE: Meeting request

Yes, let's confirm 12/10 at 4pm. For one hour?

SAMUEL B. BOXERMAN

SIDLEY AUSTIN LLP  
+1 202 736 8547  
[sboxerman@sidley.com](mailto:sboxerman@sidley.com)

---

**From:** Rakosnik, Delaney <[rakosnik.delaney@epa.gov](mailto:rakosnik.delaney@epa.gov)>  
**Sent:** Thursday, November 29, 2018 1:30 PM  
**To:** Boxerman, Samuel B. <[sboxerman@sidley.com](mailto:sboxerman@sidley.com)>  
**Subject:** RE: Meeting request

Thank you for your available dates. Very helpful.

How about 12/10 at 4pm?

---

**From:** Boxerman, Samuel B. <[sboxerman@sidley.com](mailto:sboxerman@sidley.com)>  
**Sent:** Wednesday, November 28, 2018 4:39 PM  
**To:** Rakosnik, Delaney <[rakosnik.delaney@epa.gov](mailto:rakosnik.delaney@epa.gov)>  
**Subject:** RE: Meeting request  
**Importance:** High

Thank you for getting back to me.

It turns out that we now have a conflict among our team at that time. I hope I have this right, but I believe these are our available times on those dates:

- 12/10 – after 3:30pm
- 12/11 – btw 12:30pm and 2:30pm [least preferred date]
- 12/14 – after 1:00pm
- 12/17 – after 3:30pm
- 12/18 – after 1:30pm
- 12/19 – after 1:00pm
- 12/20 – any time

Please let me know if any of those dates/times would work for Bill.

Many thanks for your assistance,

- Sam

SAMUEL B. BOXERMAN

SIDLEY AUSTIN LLP  
+1 202 736 8547  
[sboxerman@sidley.com](mailto:sboxerman@sidley.com)

---

**From:** Rakosnik, Delaney <[rakosnik.delaney@epa.gov](mailto:rakosnik.delaney@epa.gov)>  
**Sent:** Wednesday, November 28, 2018 12:45 PM

**To:** Boxerman, Samuel B. <[sboxerman@sidley.com](mailto:sboxerman@sidley.com)>

**Subject:** RE: Meeting request

Dear Sam,

Bill Wehrum is happy to meet with you. How does December 18th at 11am work for your calendars?

Many thanks,

Delaney Rakosnik

Staff Assistant

Immediate Office of the Assistant Administrator

Office of Air and Radiation, USEPA

Room 5406A, 1200 Pennsylvania Avenue NW

Washington, DC 20460

Voice: 202-564-0935

Email: [rakosnik.delaney@epa.gov](mailto:rakosnik.delaney@epa.gov)

---

**From:** Boxerman, Samuel B. <[sboxerman@sidley.com](mailto:sboxerman@sidley.com)>

**Sent:** Wednesday, November 28, 2018 9:57 AM

**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Rakosnik, Delaney <[rakosnik.delaney@epa.gov](mailto:rakosnik.delaney@epa.gov)>

**Subject:** RE: Meeting request

**Importance:** High

Good morning – Just circling back to see if there are options available to meet with Bill Wehrum on the proposed dates.

Many thanks for your assistance,

-- Sam

**SAMUEL B. BOXERMAN**

SIDLEY AUSTIN LLP

+1 202 736 8547

[sboxerman@sidley.com](mailto:sboxerman@sidley.com)

---

**From:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>

**Sent:** Wednesday, November 21, 2018 7:53 AM

**To:** Boxerman, Samuel B. <[sboxerman@sidley.com](mailto:sboxerman@sidley.com)>

**Subject:** RE: Meeting request

Hi Sam,

We will review this request and Bill Wehrum's scheduler – Delaney Rakosnik – will be in touch next week to let you know about scheduling options.

Emily

Emily Atkinson  
Special Assistant  
Management Analyst

Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406E, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

---

**From:** Boxerman, Samuel B. <[sboxerman@sidley.com](mailto:sboxerman@sidley.com)>  
**Sent:** Tuesday, November 20, 2018 4:00 PM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** Meeting request

Emily –

Good afternoon. On behalf of the National Alliance of Forest Owners (NAFO), we would request a meeting with Bill Wehrum. The purpose of the meeting would be to discuss biogenic CO2 emissions under the Clean Air Act. The proposed attendees:

Dave Tenny, NAFO

Chip Murray, NAFO

Sam Boxerman, Sidley Austin LLP (outside counsel for NAFO)

Russ Frye, FryeLaw PLLC (outside counsel to Packaging Corporation of America)

There may be other proposed attendees, but we would of course advise you in advance of our meeting in order to avoid any potential conflicts with any former clients of Mr. Wehrum or his law firm before he joined EPA.

We have availability at various times during the week of December 17 (except Friday, 12/21) – and would also have availability on 12/10-11. Please let me know available times for a meeting on those dates. We would request a 1 hour time slot.

If you have any questions, please contact me at your earliest convenience. Many thanks for your assistance,

-- Sam

SAMUEL B. BOXERMAN

SIDLEY AUSTIN LLP  
+1 202 736 8547  
[sboxerman@sidley.com](mailto:sboxerman@sidley.com)

\*\*\*\*\*  
\*\*\*\*\*

This e-mail is sent by a law firm and may contain information that is privileged or confidential.  
If you are not the intended recipient, please delete the e-mail and any attachments and notify us immediately.

\*\*\*\*\*  
\*\*\*\*\*

Message

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**From:** Rao, Raj [Rao.Raj@epa.gov]  
**Sent:** 2/19/2018 10:20:53 PM  
**To:** Wood, Anna [Wood.Anna@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Mathias, Scott [Mathias.Scott@epa.gov]  
**CC:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** Revised NSR Projects Tracker  
**Attachments:** NSR Project Tracker 2\_20\_18.docx

Hi all,

Since I will be at the retirement seminar tomorrow, attached is a revised Projects Tracker. I have a few minor edits and a substantial one.

**Ex. 5 Deliberative Process (DP)**

## Ex. 5 Deliberative Process (DP)

Cheryl/Jessica, please update the source aggregation/biomass items.

In my absence. Jessica will attend the NSR coordination meeting tomorrow.

Raj

# **Ex. 5 Deliberative Process (DP)**



# **Ex. 5 Deliberative Process (DP)**

# **Ex. 5 Deliberative Process (DP)**

# **Ex. 5 Deliberative Process (DP)**

# **Ex. 5 Deliberative Process (DP)**

# **Ex. 5 Deliberative Process (DP)**

| Project   | Target Completion Date  | Current Status   | Key Milestones   | OAQPS/OGC Staff                                     | Comments |
|---|---|--|--|---|----------|
| <b>Biomass</b><br><br>Explore options for exempting or providing regulatory relief for biomass (biogenic CO2 emissions resulting from the combustion of biomass) from permitting. | TBD – Completion date will depend on which option is pursued. Options will be determined during Wehrum briefing in the week of 3/12/18. | Brainstorming session between OAQPS and OGC held on 1/25/18.<br><br>Team developing issue/options paper. | Share draft issue paper for review by AQPD management by 2/26/18.<br><br>Briefing AQPD/OAQPS the week of 3/05/18.<br><br>Briefing Bill Wehrum the week of 3/12/18. | Jessica Montañez,<br>Carrie Wheeler/Nora Greenglass |          |

Message

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**From:** Rao, Raj [Rao.Raj@epa.gov]  
**Sent:** 6/11/2018 5:05:41 PM  
**To:** Santiago, Juan [Santiago.Juan@epa.gov]  
**CC:** Mathias, Scott [Mathias.Scott@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Subject:** Revised Project Tracker  
**Attachments:** NSRG Project Tracker 061118.docx

Juan, attached is the revised project tracker for your coordination meeting with Anna tomorrow – again Cheryl and I won't be there.

Raj Rao, P.E.  
Group Leader, New Source Review Group,  
Air Quality Policy Division,  
Office of Air Quality Planning and Standards (MD-C504-03)  
US Environmental Protection Agency  
109 TW Alexander Drive  
Research Triangle Park, NC 27709  
919-541-5344  
919-541-5509 - Fax

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Deliberative and Confidential

# **Ex. 5 Deliberative Process (DP)**



# **Ex. 5 Deliberative Process (DP)**

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# **Ex. 5 Deliberative Process (DP)**

# **Ex. 5 Deliberative Process (DP)**

| Project   | Target Completion Date      | Current Status   | Key Milestones  | OAQPS/OGC Staff                   | Comments  |
|---|-----------------------------|--|---|-----------------------------------|---|
| <b>Biomass</b><br><br>Explore options for exempting or providing regulatory relief from permitting for biogenic CO <sub>2</sub> emissions resulting from the combustion of biomass. | Tier 1 Rule NPRM<br>10/2019 | Policy statement on Forest Biomass issued by the Administrator on 4/23/18<br><br>Working on briefing paper for Bill Wehrum.<br><br>Next workgroup meeting on 6/18. | Brief AQPD I/O week of 7/09/18<br><br>Early Guidance - 7/19/18<br><br>Detailed Analytical Blueprint - 8/23/18<br><br>Options selection - 10/11/18<br><br>Draft proposal FRN to WG on 12/13/18 | Jessica Montañez /Nora Greenglass | Workgroup is currently working on edits to the briefing paper. We expect to receive most edits by COB 6/13. |

# **Ex. 5 Deliberative Process (DP)**

# **Ex. 5 Deliberative Process (DP)**

# **Ex. 5 Deliberative Process (DP)**



## Ex. 5 Deliberative Process (DP)

|   |  |  |   |  |  |
|---|--|--|---|--|--|
| <b>Biomass</b><br><br>Explore options for exempting or providing regulatory relief for biomass (biogenic CO2 emissions resulting from the combustion of biomass) from permitting. | TBD -- Completion date will depend on which option is pursued. Options will be determined during Wehrum briefing | Brainstorming session between OAQPS and OGC held on 1/25/18.<br><br>Team developing issue/options paper. | Share draft issue paper for review by AQPD management by 2/26/18.<br><br>Briefing for AQPD/OAQPS the week of 3/05/18. | Jessica Montañez, Carrie Wheeler/Nora Greenglass |  |
|---|--|--|---|--|--|

[ PAGE \\* MERGEFORMAT ]

| NSR Project | Target Completion Date      | Current Status | Key Milestones                        | OAQPS/OGC Staff | Comments |
|-------------|-----------------------------|----------------|---------------------------------------|-----------------|----------|
|             | during the week of 3/12/18. |                | Briefing Bill Wehrum week of 3/12/18. |                 |          |

Ex. 5 Deliberative Process (DP)

# **Ex. 5 Deliberative Process (DP)**

# **Ex. 5 Deliberative Process (DP)**

## Ex. 5 Deliberative Process (DP)

|   |   |  |  |  |  |
|---|---|--|--|--|--|
| <b>Biomass</b>  |   |  |  |  |  |
| Explore options for exempting or providing regulatory relief for biomass (biogenic CO2 emissions resulting from the combustion of biomass) from permitting. | TBD – Completion date will depend on which option is pursued. Options will be determined during Wehrum briefing during the week of 3/12/18. | Brainstorming session between OAQPS and OGC held on 1/25/18.<br><br>Team developing issue/options paper. | Share draft issue paper for review by AQPD management by 2/26/18.<br><br>Briefing for AQPD/OAQPS the week of 3/05/18.<br><br>Briefing Bill Wehrum week of 3/12/18. | Jessica Montañez, Carrie Wheeler/Nora Greenglass |  |
|   |   |  |  |  | <b>Ex. 5 Deliberative Process (DP)</b> |

Message

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**From:** Vetter, Cheryl [Vetter.Cheryl@epa.gov]  
**Sent:** 2/8/2018 8:51:30 PM  
**To:** Mathias, Scott [Mathias.Scott@epa.gov]  
**Subject:** NSR Project Tracker 2\_7\_18 Revised  
**Attachments:** NSR Project Tracker 2\_7\_18 Revised.docx

Scott –

Here are my edits to the NSR tracker, based on our meeting with Anna earlier this week. I have included dates for the common control guidance.

# **Ex. 5 Deliberative Process (DP)**

# **Ex. 5 Deliberative Process (DP)**



## Ex. 5 Deliberative Process (DP)

|   |  |  |   |  |  |
|---|--|--|---|--|--|
| <b>Biomass</b>  |  |  |   |  |  |
| Explore options for exempting or providing regulatory relief for biomass (biogenic CO2 emissions resulting from the combustion of biomass) from permitting. | TBD – Completion date will depend on which option is pursued. Options will be determined during Wehrum briefing during the | Brainstorming session between OAQPS and OGC held on 1/25/18.<br><br>Team developing issue/options paper. | Share draft issue paper for review by AQPD management 2/14/18.<br><br>Briefing for AQPD/OAQPS 2/21/18.<br><br>Briefing Bill Wehrum week of 2/26/18. | Jessica Montañez, Carrie Wheeler/Nora Greenglass |  |

| NSR Project | Target Completion Date | Current Status | Key Milestones | OAQPS/OGC Staff | Comments |
|-------------|------------------------|----------------|----------------|-----------------|----------|
|             | week of 2/26/18.       |                |                |                 |          |

## NSR Updates Meeting with Bill Wehrum

03/15/18

### Agenda

1. Overview

**Ex. 5 Deliberative Process (DP)**

6. Biomass Update

7. NSR Projects Tracker

## Appointment

---

**From:** Mathias, Scott [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4BE52CDCCA348EEB5CD1EFEBE6CAF24-SMATHIAS]  
**Sent:** 12/19/2019 11:01:45 PM  
**To:** Iglesias, Amber [Iglesias.Amber@epa.gov]  
**Subject:** Tentative: Final Agency Review Meeting for the Proposed Rule: Treatment of Forest Biogenic CO2 Emissions under the Clean Air Act Permitting (Tier 1, SAN 6715; RIN 2060-AU03)  
**Location:** **Ex. 6 Personal Privacy (PP)**  
**Start:** 1/15/2020 7:00:00 PM  
**End:** 1/15/2020 7:30:00 PM  
**Recurrence:** (none)

Message

---

**From:** Mathias, Scott [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4BE52CDCCA348EEB5CD1EFEBE6CAF24-SMATHIAS]  
**Sent:** 1/13/2020 1:57:50 PM  
**To:** Massey, Lana [massey.lana@epa.gov]  
**Subject:** FW: Meeting Materials: Treatment of Biogenic CO2 emissions at stationary sources  
**Attachments:** Revised Proposed Biogenic CO2 Rule Briefing 1-8-20.docx

Please print.

Scott Mathias | Acting Director, Air Quality Policy Division | U.S. EPA, RTP, NC 27711 | 919.541.5310

CONFIDENTIALITY. This email and any attachments are confidential, except where the email states it can be disclosed; it may also be covered by deliberative privilege. If received in error, please do not disclose the contents to anyone, but notify the sender by return email and delete this email and any attachments from your system.

---

**From:** Hagan, Nicole <Hagan.Nicole@epa.gov>  
**Sent:** Friday, January 10, 2020 10:16 AM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Baker, Sarah <baker.sarah@epa.gov>; Svendsgaard, Dave <Svendsgaard.Dave@epa.gov>  
**Cc:** McKinney, Voronina <mckinney.voronina@epa.gov>; Massey, Lana <massey.lana@epa.gov>; Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>; Long, Pam <Long.Pam@epa.gov>  
**Subject:** Meeting Materials: Treatment of Biogenic CO2 emissions at stationary sources

Please see the attached materials for the following meeting:

Monday, January 13, 2020 @ 12:45pm: Treatment of Biogenic CO2 emissions at stationary sources

Nicole A. Hagan, Ph.D.  
U.S. Environmental Protection Agency  
Office of Air and Radiation  
Office of Air Quality Planning and Standards  
Phone: (919) 541-3153  
Email: [hagan.nicole@epa.gov](mailto:hagan.nicole@epa.gov)

Message

---

**From:** Mathias, Scott [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4BE52CDCCCA348EEB5CD1EFEBE6CAF24-SMATHIAS]  
**Sent:** 9/24/2019 3:12:25 PM  
**To:** Simon, Karl [Simon.Karl@epa.gov]  
**Subject:** RE: feedback from today's OAR 1/1

We did not have a heads-up. We read about it in the NYT.

Scott Mathias | Acting Director, Air Quality Policy Division | U.S. EPA, RTP, NC 27711 | 919.541.5310

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---

**From:** Simon, Karl <Simon.Karl@epa.gov>  
**Sent:** Tuesday, September 24, 2019 10:06 AM  
**To:** Mathias, Scott <Mathias.Scott@epa.gov>  
**Subject:** Re: feedback from today's OAR 1/1

(b) (5)  
(b) (5)

On Sep 11, 2019, at 12:13 PM, Mathias, Scott <Mathias.Scott@epa.gov> wrote:

<image001.gif>  
Hi Karl,

(b) (5)  
(b) (5)

Scott Mathias | Acting Director, Air Quality Policy Division | U.S. EPA, RTP, NC 27711 | 919.541.5310

CONFIDENTIALITY. This email and any attachments are confidential, except where the email states it can be disclosed; it may also be covered by deliberative privilege. If received in error, please do not disclose the contents to anyone, but notify the sender by return email and delete this email and any attachments from your system.

---

**From:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Sent:** Monday, September 09, 2019 3:58 PM  
**Subject:** feedback from today's OAR 1/1

**AQPD**

**AWAITING FEEDBACK FROM OAR**

*Biogenic CO2: Mike reminded Anne that we are still waiting on the legal rationale and she will follow-up with Matt.*

*Revoking 2008 Ozone Standard (Scott sent email to Mike last week): Mike provided a heads-up to Anne that she may be hearing something about this from DOT or OTAQ. It was acknowledged that we should basically hold tight for now.*

---

Thank you,

***Yvonne W. Johnson***

Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
[johnson.yvonne@epa.gov](mailto:johnson.yvonne@epa.gov)

## Appointment

---

**From:** Wood, Anna [Wood.Ann@epa.gov]  
**Sent:** 5/8/2018 4:39:31 PM  
**To:** Wood, Anna [Wood.Ann@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]; Rao, Raj [Rao.Raj@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Wayland, Richard [Wayland.Richard@epa.gov]; Johnson, Steffan [johnson.steffan@epa.gov]; Fox, Tyler [Fox.Tyler@epa.gov]; George Bridgers [Bridgers.George@epa.gov]; Owen, Chris [Owen.Chris@epa.gov]; Svendsgaard, Dave [Svendsgaard.Dave@epa.gov]; Keller, Peter [keller.peter@epa.gov]; Buckler, Charles [Buckler.Charles@epa.gov]; Montanez, Jessica [Montanez.Jessica@epa.gov]  
**CC:** Hemby, James [Hemby.James@epa.gov]  
**Subject:** AF&PA RTP Visit (permitting)  
**Attachments:** AF&PA May 2018.docx  
**Location:** C-112  
  
**Start:** 5/9/2018 6:00:00 PM  
**End:** 5/9/2018 7:00:00 PM  
**Show Time As:** Busy

**Full agenda and AF&PA attendees attached.**

### **Meet with AQPD & AQAD**

- **2:00 – 3:00**
  - Biomass rulemaking – schedule, scope, rationale
  - NSR/PSD Improvements – ambient air, project aggregation, RMRR, PALS, others
  - SSM SIP Call



Message

---

**From:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Sent:** 12/10/2018 9:35:59 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** NAFO Meeting Notes - December 10, 2018

- Someone brought a summary of all the comments NAFO has put in the docket for our consideration.
- Schedule – we are hearing from the Administrator that there is a priority on thinking about the carbon neutrality of biomass. His plan was to get a proposed rule out in the next 6-8 months and a final rule by the end of 2019. Is that correct?
  - Biomass rule – doing something by the end of 2019 is definitely possible. We are at the beginning stages of this.
  - Final ACE rule is on a faster track.
  - Are the ACE rule people connected with the standalone people or is that something we need to facilitate? Bill, you are talking to the ACE rule people in the room. Anna, we definitely have connectivity. The permitting part of ACE comes from Anna's shop.
- Final ACE Rule comments – biomass as a compliance option? If we are going to keep biomass as a compliance option, EPA needs to provide a rationale and the same rationale should apply to other programs like permitting.
- International competitiveness of biomass issue – is there anything they should be doing to move the ball forward on this to align with Europe? It is a difficult decision and something that is still being explored by the Agency. Sarah D.: The Agency science has been developed and the policy folks shop need to make a decision.
- Any need to meet with the legal folks soon? They have done so in the past and would like to do so again if that helps move things forward. We are in communications with the legal folks.

Message

---

**From:** Karen Mongoven [kmongoven@4cleanair.org]  
**Sent:** 2/6/2019 5:45:35 PM  
**To:** Rao, Raj [Rao.Raj@epa.gov]; Vetter, Cheryl [Vetter.Cheryl@epa.gov]; Montanez, Jessica [Montanez.Jessica@epa.gov]; Svendsgaard, Dave [Svendsgaard.Dave@epa.gov]; Wood, Anna [Wood.Anna@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]; Kornylak, Vera S. [Kornylak.Vera@epa.gov]; Dalcher, Debra [dalcher.debra@epa.gov]  
**Subject:** Planning agenda for 2/13 NACAA Permitting & NSR Call

Greetings all!

It is time to plan the agenda for the next NACAA Permitting and NSR Committee call, and I am so happy that EPA is open again. Welcome back!

The next call is a week from today – **Wednesday, February 13 beginning at 12:00 p.m. Eastern**. What would EPA like to include on the agenda? For one thing, we would certainly appreciate updates on the timing of forthcoming guidance and rulemakings, and how/whether the shutdown may have affected them. Off the top of my head, that would include:

- (1) The proposed rule on **project emissions accounting** (I had December 2018 listed as the target date)
- (2) The rule to codify the rescission of **once in, always in** – is this still planned to come out this month?
- (3) The deadline for comments on the draft **exclusions from ambient air** guidance was during the shutdown – is EPA extending that at all?
- (4) Anticipated dates for finalizing (a) the guidance on determining “**adjacency**” and (b) the exclusions from ambient air guidance?
- (5) Anything concrete on a proposed **biogenic CO2** permitting rule?

I’m sure I’m probably missing something, and of course we are eager to hear about and offer input on anything else that you are working on. Please let me know. Thanks very much!

Karen

\* \* \*

Karen K. Mongoven  
Senior Staff Associate  
National Association of Clean Air Agencies  
444 North Capitol Street, NW, Suite 307  
Washington, DC 20001  
Phone: (202) 624-7864  
Fax: (202) 624-7863  
[kmongoven@4cleanair.org](mailto:kmongoven@4cleanair.org)

**From:** Baker, Sarah [baker.sarah@epa.gov]  
**Sent:** 1/28/2019 9:50:45 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** RE: Biomass Rulemaking Update

## Ex. 6 Personal Privacy (PP)

**From:** Montanez, Jessica  
**Sent:** Monday, January 28, 2019 3:36 PM  
**To:** Baker, Sarah <baker.sarah@epa.gov>  
**Subject:** RE: Biomass Rulemaking Update

Oh, Ok. No one has given me details either so I am not sure what Cheryl and Vera are thinking. So far, I am not presenting tomorrow and yes, my understanding was that we were going to at least talk to OGC and OAP before we moved forward.

## Ex. 6 Personal Privacy (PP)

Jessica

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**From:** Baker, Sarah  
**Sent:** Monday, January 28, 2019 3:32 PM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>  
**Subject:** RE: Biomass Rulemaking Update

No one has spoken to me about it so I really don't know. The meeting tomorrow morning was a bit of a surprise to me so I assumed that you were presenting **Ex. 5 Deliberative Process (DP)**  
**Ex. 5 Deliberative Process (DP)** Cheryl is in a managers meeting so I will try and find out what is going on once she is out.

## Ex. 6 Personal Privacy (PP)

Sarah

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**From:** Montanez, Jessica  
**Sent:** Monday, January 28, 2019 3:11 PM  
**To:** Baker, Sarah <baker.sarah@epa.gov>  
**Subject:** RE: Biomass Rulemaking Update

**Ex. 6 Personal Privacy (PP)** Are you presenting?

Jessica

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**From:** Baker, Sarah  
**Sent:** Monday, January 28, 2019 3:08 PM

**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>

**Subject:** RE: Biomass Rulemaking Update

Thanks Jessica. I did see that the meeting with Peter was rescheduled for tomorrow morning. Were you planning on calling in for that?

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**From:** Montanez, Jessica

**Sent:** Monday, January 28, 2019 3:01 PM

**To:** Baker, Sarah <baker.sarah@epa.gov>; Spangler, Matthew <Spangler.Matthew@epa.gov>

**Cc:** Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>

**Subject:** Biomass Rulemaking Update

Sarah and Matt,

This is the information I have, but it seems like you guys are already working on a meeting with Peter tomorrow and a revised paper. Let me know if you have any questions or you still want to meet.

Jessica

**Biomass Rulemaking Update**

1. We were working on an updated briefing paper for Peter Tsirigotis and then hopefully use it for Bill Wehrum on new options to address biomass in permitting. We were asked to look at options that could be singles and doubles, not home runs.
2. This briefing paper was prepared before the holidays with APQD input only, it has not been shared with OGC nor OAP for this limited consultation with management. OAP knows that we were working on it, I don't know if OGC knows. The agency wide workgroup has not met since October. Persons in agency-wide workgroup:
  - a. OAP
    - i. John Steller – main staff contact
    - ii. Sara Ohrel – person with the most historical knowledge, she was in charge before switching her work schedule to part-time.
    - iii. Bill Irving – Manager
  - b. OGC
    - i. Nora Greenglass – main staff contact
    - ii. Brian Doster – Manager
  - c. OAP
    - i. Elman, Barry <Elman.Barry@epa.gov>
  - d. OTAQ
    - i. Robin Moran – staff person, although she works for the Assessment and Standards Division front office
    - ii. Chris Grundler – OTAQ Office Director, have been involved in meetings with Peter
    - iii. Bill Charmley – Assessment and Standards Division Director, has been involved in meeting with Peter
  - e. Region 1
    - i. Bird, Patrick <Bird.Patrick@epa.gov>; Moskal, John <Moskal.John@epa.gov>;
  - f. Region 4
    - i. Shepherd, Lorinda <Shepherd.Lorinda@epa.gov>; Johnson, Terry <Johnson.Terry@epa.gov>; Ceron, Heather <Ceron.Heather@epa.gov> (Manager)
  - g. Region 6
    - i. Toups, Brad <Toups.Brad@epa.gov>;
  - h. Region 10
    - i. McFadden, Kelly <McFadden.Kelly@epa.gov>;
3. The meetings with Peter and Bill would have to be requested again.

4. The rulemaking schedule in OAR's rulemaking tracker needs to be updated as well. It currently says that early guidance with the Administrator was going to happen by 1/31.
5. I am also attaching the historical paper we used in case you need it in the future or as reference.

Message

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**From:** Portanova, Sam [portanova.sam@epa.gov]  
**Sent:** 10/4/2018 10:35:29 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]; Toups, Brad [Toups.Brad@epa.gov]  
**CC:** Damico, Genevieve [damico.genevieve@epa.gov]  
**Subject:** RE: Biogenic CO2 Sources- Request for Information by noon on Friday, October 5.  
**Attachments:** R5 BiomassData10012018.xlsx

Jessica and Brad,  
Attached is Region 5's response to this request.

Sam Portanova  
U.S. EPA, Region 5  
77 W. Jackson Blvd (AR-18J)  
Chicago, IL 60604  
(312) 886-3189  
portanova.sam@epa.gov

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**From:** Toups, Brad  
**Sent:** Monday, October 01, 2018 3:44 PM  
**To:** Biton, Leiran <biton.leiran@epa.gov>; Bray, Dave <Bray.Dave@epa.gov>; Ceron, Heather <Ceron.Heather@epa.gov>; Chan, Suilin <Chan.Suilin@epa.gov>; Dahl, Donald <dahl.donald@epa.gov>; Damico, Genevieve <damico.genevieve@epa.gov>; Davis, Scott <Davis.ScottR@epa.gov>; duke, gerallyn <duke.gerallyn@epa.gov>; Fallon, Gail <fallon.gail@epa.gov>; Hardesty, Doug <Hardesty.Doug@epa.gov>; Knodel, Jon <Knodel.Jon@epa.gov>; Maldonado, Zelma <Maldonado.Zelma@epa.gov>; McFadden, Kelly <McFadden.Kelly@epa.gov>; Mooney, John <Mooney.John@epa.gov>; Rao, Raj <Rao.Raj@epa.gov>; Rios, Gerardo <Rios.Gerardo@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Smith, Mark A. <Smith.Marka@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Werner, Leslye <Werner.Leslye@epa.gov>; Wortman, Eric <Wortman.Eric@epa.gov>  
**Subject:** Biogenic CO2 Sources- Request for Information by noon on Friday, October 5.

Hi APMs,

I am Brad Toups, Region 6's representative on this workgroup, I am assisting Jessica with this request. You can contact me at 214 665-7258 or [toups.brad@epa.gov](mailto:toups.brad@epa.gov). Jessica's request follows:

Dear APMs,

As you know, we are working on a rulemaking on how to address biogenic CO<sub>2</sub> emissions in permitting. We are currently awaiting for the Early Guidance briefing for this rulemaking to be scheduled and in the meantime OAR management has asked us to start exploring approximately how many and what types of sources (i.e., facilities) could potentially take advantage of any type of biogenic CO<sub>2</sub> exemption if we were to propose one. We have asked for this information already from the regions that are part of the rulemaking workgroup, but we also wanted to extend this request to the other regions that are not currently in the workgroup.

**OAR has two requests and would like to receive the most data we can gather by noon on Friday, October 5. The data request is from what your region might know about biogenic CO<sub>2</sub> emitting sources, we would not like to poll the states for this information at this time as we might get into Information Collection Request issues otherwise.**

For the first and most important request, we are wondering if your region can provide some examples of the types of biogenic CO<sub>2</sub> emitting sources that you are aware are subject to permitting (PSD major or minor NSR) and what is the amount of biogenic CO<sub>2</sub> emissions they are emitting or plan to emit from their overall CO<sub>2</sub> equivalent emissions projections. We are thinking sources under the categories of biobased transportation fuels production, biopower production and biobased product development, but let us know if there could be other categories. For each of the examples, can you include the following information, if available, in the first request tab of the attached spreadsheet:

1. Permit Number
2. Source Name
3. State
4. Source Type (power plant, biofuel production, pellet plant, cement plant, landfill, etc.)
5. Type of Biomass They are Burning/Plan to Burn (forest biomass, wood waste, etc.)
6. Projected Amount of GHG emissions, including the biomass emissions separately, if available.

The second request is to compile a list of any type of biogenic CO<sub>2</sub> emission sources that you are aware that you or your states have permitted or can quickly confirm that were permitted.

- To aid in this request, I did a quick online data search and found that Biomass Magazine publishes a list of what they consider the number of biomass power plants, pellet plants and biogas plants as of September 2018 that are operational, under construction or proposed (see tab titled Second Request in attached spreadsheet). I do not know the quality of this information, therefore, can you quickly confirm if some of these sources have been permitted or are in the process of being permitted by you or your states? The capacity of some of these sources might be small enough to not require an NSR permit. In addition, if you are aware of other biogenic CO<sub>2</sub> emitting sources that have been permitted in or outside of those categories (power plants, pellet plants or biogas plants), can you add them to the list? If it is not possible to confirm or obtain this data in the time we have available to collect it, just let us know. We know that this data is not readily available.
- I also did a quick search in the RBLC and found that the following sources were permitted for one or more types of biomass feedstocks. I have not added them to the list since I am not sure what their current status is (operational, under construction or even on hold/will never get built). Can you confirm the status of the following list of sources, if possible, and add them to the second request list as appropriate? These could also serve as some of the examples for the first request above. I added them to the first request tab in case that information is available to you.
  1. CA - Sierra Pacific Anderson (RBLC ID: CA-1225)
  2. IN - Abengoa Bioenergy of Indiana (RBLC ID: IN-0186)
  3. KS - Abengoa Bioenergy of Kansas (RBLC ID: KS-0034)
  4. MI - Wolverine Power (RBLC ID: MI-0400)
  5. OK – Broken Bow OSB Mill, Huber Engineered Woods (RBLC ID: OK-0145)
  6. PR – Energy Answers (RBLC ID: PR-0009)
  7. MI – Grayling Particleboard, Arauco North America (RBLC ID: MI-0425)

Thanks in advance and let me know if you have any questions,

Jessica

| Permit Number<br>(If available) | Source Name                                       | State |
|---------------------------------|---|-------|
| None                            | Sierra Pacific Anderson                           |       |
|                                 | Abengoa Bioenergy of Indiana                      | IN    |
|                                 | Abengoa Bioenergy of Kansas                       |       |
|                                 | Wolverine Power                                   | MI    |
|                                 | Broken Bow OSB Mill, Huber Engineered Woods       |       |
|                                 | Energy Answers                                    |       |
|                                 | Grayling Particleboard, Arauco North America      | MI    |
|                                 | Calumet Renewable Energy - Pagels Ponderosa       | WI    |
|                                 | Archer Daniels Midland Company (ADM), Decatur, IL | IL    |
|                                 | Hoosier Energy                                    | IL    |
| <u>181-35120-00057</u>          | BioTown Ag Incorporated                           | IN    |
| <u>019-36988-00097</u>          | Clark-Floyd Landfill                              | IN    |



| Source Type (power plant, cement plant, etc.) | Type of Biomass (forest biomass, wood waste, etc.) | Type of NSR Permit (PSD major, minor) |
|---|--|---------------------------------------|
| PLANT CLOSED IN 2017                          | NONE   | PSD                                   |
|   |  | PSD                                   |
|   |  | PSD                                   |
| 400 MW power plant                            | NONE   | PSD                                   |
|   |  | PSD                                   |
|   |  | PSD                                   |
| particle board manufacturing                  | forest biomass                                     | PSD                                   |
|   |  | PSD                                   |

Biomethane Recovery High Btu Plant

|  |                                      |                     |
|--|--------------------------------------|---------------------|
|  | biogas from an anaerobic digester    | Title V / minor NSR |
| Agricultural food products (lysine production) | Fermentation of dextrose             | PSD                 |
| Landfill Gas-to-Energy                         | LFG                                  | PSD                 |
| Electricity generation                         | Animal manure, other bio-based waste | PSD minor           |
| Municipal landfill                             | Biomass waste                        | PSD minor           |

**Total GHG emissions (CO2e  
equivalent)**

**Biogenic CO2 Emissions (portion of total  
GHG emissions in CO2e or percent from  
total GHG emissions if available)**

257,768

33,940 TPY

See support document calculations  
See support document calculations

See support document calculations  
See support document calculations

| Plant   | Location | Source Type  |
|---|----------|--------------|
| Chip Energy                                       | IL       | Pellet Plant |
| Bloomington & Normal - West WRF                   | IL       | Biogas Plant |
| DOWNERS GROVE Sanatary District WRF               | IL       | Biogas Plant |
| Hillcrest Dairy (Formerly New Horizons)           | IL       | Biogas Plant |
| Hunter Haven Farms Inc.                           | IL       | Biogas Plant |
| Livingston Renewable Energy Station               | IL       | Biogas Plant |
| Orchard Hills Landfill Methane Generation Project | IL       | Biogas Plant |
| Rock River WRD                                    | IL       | Biogas Plant |
| The Plant - Bubbly Dynamics LLC                   | IL       | Biogas Plant |
| Covanta Indianapolis                              | IN       | Power Plant  |
| Easy Heat-Indianapolis                            | IN       | Pellet Plant |
| Smith Creek                                       | IN       | Pellet Plant |
| Southern Indiana Hardwoods                        | IN       | Pellet Plant |
| Bio Town Ag Inc.                                  | IN       | Biogas Plant |
| Bos Dairy   | IN       | Biogas Plant |
| Clark-Floyd Landfill Methane Generation Plant     | IN       | Biogas Plant |
| Culver Duck Inc..                                 | IN       | Biogas Plant |
| Fair Oaks Dairy - Digester 1                      | IN       | Biogas Plant |
| Fair Oaks Dairy - Digester 2                      | IN       | Biogas Plant |
| Green Cow Power                                   | IN       | Biogas Plant |
| Herrema Dairy                                     | IN       | Biogas Plant |
| Hidden View Dairy                                 | IN       | Biogas Plant |
| Terre Haute Wastewater Treatment Plant            | IN       | Biogas Plant |
| Waste No Energy LLC                               | IN       | Biogas Plant |
| Windy Ridge Dairy                                 | IN       | Biogas Plant |
| Cabin Creek Renewable Energy Project              | IN       | Biogas Plant |
| Cadillac Renewable Energy                         | MI       | Power Plant  |
| Covanta Kent                                      | MI       | Power Plant  |
| Detroit Renewable Power                           | MI       | Power Plant  |
| Genesee Power Station LP                          | MI       | Power Plant  |
| Grayling Generating Station                       | MI       | Power Plant  |
| Hillman Power LLC                                 | MI       | Power Plant  |
| L'Anse Warden Electric Company                    | MI       | Power Plant  |
| Viking Energy of Lincoln                          | MI       | Power Plant  |
| Viking Energy of McBain                           | MI       | Power Plant  |
| Fiber By-Products Corp.                           | MI       | Pellet Plant |
| Isabella Pellet                                   | MI       | Pellet Plant |
| Kirtland Products                                 | MI       | Pellet Plant |
| Maeder Brothers Quality Wood Pellets Inc.         | MI       | Pellet Plant |

| Feedstock or<br>Biogas End Use | Capacity<br>(MW for<br>Power,<br>metric<br>tons/yr for<br>Pellets,<br>KW for<br>Biogas) | Status             |
|--------------------------------|---|--------------------|
| Wood waste                     | 36500   | Under Construction |
| Pipeline Gas                   |   | Operational        |
| Electricity                    |   | Operational        |
| Cogeneration                   |   | Operational        |
| Cogeneration                   |   | Operational        |
| Electricity                    |   | Operational        |
| Electricity                    |   | Operational        |
| Electricity/Process Heat       |   | Operational        |
| Cogeneration                   |   | Proposed           |
| Municipal solid waste          | 7   | Operational        |
| Hardwood                       | 21800   | Operational        |
| Hardwood                       | 13600   | Operational        |
| Hardwood                       | 11800   | Operational        |
| Cogeneration                   |   | Operational        |
| Electricity                    |   | Operational        |
| Electricity                    |   | Operational        |
| Cogeneration                   |   | Operational        |
| Electricity/CNG                |   | Operational        |
| Cogeneration/CNG               |   | Operational        |
| Cogeneration                   |   | Operational        |
| Cogeneration                   |   | Operational        |
| Cogeneration                   |   | Operational        |
| Pipeline gas                   |   | Operational        |
| Cogeneration                   |   | Operational        |
| Electricity                    |   | Operational        |
| Electricity                    |   | Proposed           |
| Forest residue                 | 39.6  | Operational        |
| Municipal solid waste          | 18  | Operational        |
| Municipal solid waste          | 68  | Operational        |
| Wood waste                     | 40  | Operational        |
| Woody biomass                  | 38  | Operational        |
| Wood waste                     | 20  | Operational        |
| Wood waste, railroad ties      | 20  | Operational        |
| Wood waste                     | 18  | Operational        |
| Wood waste                     | 17  | Operational        |
| Hardwood                       | 90000   | Operational        |
| Hardwood/softwood              | 13600   | Operational        |
| Hardwood/softwood              | 27200   | Operational        |
| Hardwood                       | 16300   | Operational        |

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Permit type

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| Title V  |        |
| Cannot find permit record  |        |
| Cannot find permit record  |        |
| Minor source op permit   |        |
| Title V  |        |
| Minor source op permit   |        |
| Title V  |        |
| Minor source op permit   |        |
| Withdrawn registration   |        |
| Withdrawn registration   |        |
| FESOP  |        |
| Minor source op permit   |        |
| Minor source op permit   |        |
| Cannot find permit record  |        |
| Minor source op permit   |        |
| Minor source op permit   |        |
| Cannot find permit record  |        |
|  | 508538 |
| no permits found   |        |
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| permit was located but there was no GHG/CO2e information in the permit or statement of basis |        |
|  | 480110 |
|  | 233789 |
|  | 259183 |
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| permit was located but there was no GHG/CO2e information in the permit or statement of basis |        |
|  | 6521   |

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|--|----|--------------|
| Michigan Wood Fuels                            | MI | Pellet Plant |
| Vulcan Wood Products                           | MI | Pellet Plant |
| Brook View Dairy                               | MI | Biogas Plant |
| City of Petoskey WWTP                          | MI | Biogas Plant |
| Den Dulk Dairy                                 | MI | Biogas Plant |
| Fremont Community Digester                     | MI | Biogas Plant |
| Geerlings Hillside Farms Overisel Hog Facility | MI | Biogas Plant |
| Genesee County Linden WWTP                     | MI | Biogas Plant |
| Green Meadow Dairy                             | MI | Biogas Plant |
| Lowell Energy Anaerobic Digester               | MI | Biogas Plant |
| Midland WWTP                                   | MI | Biogas Plant |
| Orchard Hills Generating Station               | MI | Biogas Plant |
| Pontiac WWTP                                   | MI | Biogas Plant |
| Scenic View Dairy - Fennville                  | MI | Biogas Plant |
| Willow Point Dairy                             | MI | Biogas Plant |
| <hr/>  |    |              |
| Benson Power LLC                               | MN | Power Plant  |
| Elk River Energy Recovery Station              | MN | Power Plant  |
| Hennepin Energy Resource Co. LP                | MN | Power Plant  |
| Hibbard Energy Center                          | MN | Power Plant  |
| Koda Energy LLC                                | MN | Power Plant  |
| Olmsted Waste-To-Energy Facility               | MN | Power Plant  |
| Perham Resource Recovery Facility              | MN | Power Plant  |
| Potlatch Bemidji                               | MN | Power Plant  |
| Rapids Energy Center                           | MN | Power Plant  |
| Red Wing Generating Station                    | MN | Power Plant  |
| St. Paul Cogeneration LLC                      | MN | Power Plant  |
| Wilmarth Generating Station                    | MN | Power Plant  |
| Northland Pallet Inc.                          | MN | Pellet Plant |
| Chippewa Valley Ethanol Co. - Biomass Gasifer  | MN | Biogas Plant |
| Diamond K Dairy/Ponderosa Dairies              | MN | Biogas Plant |
| District 45 Dairy                              | MN | Biogas Plant |
| Hometown Bioenergy LLC                         | MN | Biogas Plant |
| Jer-Lindy Farms                                | MN | Biogas Plant |
| Northern Plains Dairy                          | MN | Biogas Plant |
| Owatonna Wastewater Treatment Facility         | MN | Biogas Plant |
| Riverview Dairy                                | MN | Biogas Plant |
| West River Dairy                               | MN | Biogas Plant |
| Revier Cattle Company                          | MN | Biogas Plant |
| <br>   |    |              |
| American Wood Fibers-Circleville               |    |              |
| Easy Heat-S. Charleston                        | OH | Pellet Plant |
| Northeast Wood Products LLC-Ligonier           | OH | Pellet Plant |
| Northeast Wood Products LLC-Peebles            | OH | Pellet Plant |
| Sugar Creek Shavings                           | OH | Pellet Plant |
| Akron Renewable Energy/KB BioEnergy            | OH | Pellet Plant |
| Bridgewater Dairy LLC                          | OH | Biogas Plant |
| Dovetail Energy LLC                            | OH | Biogas Plant |



|   |       |             |
|---|-------|-------------|
| Hardwood  | 54400 | Operational |
| Hardwood/softwood   | 8200  | Operational |
| Electricity/Boiler/Furnace Fuel                                       |       | Operational |
| Electricity   |       | Operational |
| Cogeneration  |       | Operational |
| Electricity   |       | Operational |
| Cogeneration/Boiler Furnace Fuel                                      |       | Operational |
| Pipeline Gas  |       | Operational |
| Electricity   |       | Operational |
| Electricity   |       | Operational |
| Electricity   |       | Operational |
| Electricity   |       | Operational |
| Process Heat/Engine Driven Blower                                     |       | Operational |
| Cogeneration  |       | Operational |
| Boiler/Furnace Fuel   |       | Operational |
| Wood chips, poultry litter  | 50    | Operational |
| Refuse-derived fuel   | 33    | Operational |
| Municipal solid waste   | 40    | Operational |
| Logging, mill residue   | 72.8  | Operational |
| Oat and rice hulls, corn, barley and malt screening, urban tree waste | 23.4  | Operational |
| Municipal solid waste   | 9.6   | Operational |
| Municipal solid waste   | 4.5   | Operational |
| Mill residue  | 10    | Operational |
| Logging, mill residue   | 26.5  | Operational |
| Refuse-derived fuel   | 20    | Operational |
| Urban wood residue  | 33    | Operational |
| Refuse-derived fuel, woody biomass                                    | 20    | Operational |
| Hardwood/softwood   | 13600 | Operational |
| Producer Gas for use within the facility                              |       | Operational |
| Cogeneration  |       | Operational |
| Cogeneration  |       | Operational |
| CHP   |       | Operational |
| Electricity   |       | Operational |
| Cogeneration  |       | Operational |
| Electricity   |       | Operational |
| Electricity   |       | Operational |
| Electricity   |       | Operational |
|   |       | Proposed    |
| Hardwood/softwood   | 45400 | Operational |
| Hardwood  | 21800 | Operational |
| Hardwood  | 59000 | Operational |
| Hardwood  | 59000 | Operational |
| Hardwood  | 2300  | Operational |
| CHP   |       | Operational |
| Cogeneration  |       | Operational |

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permit was located but there was no GHG/CO2e information in the permit or statement of basis

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permit was located but there was no GHG/CO2e information in the permit or statement of basis

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Wood processing plant with Permit-to-Install/Operate

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|  |    |              |
|--|----|--------------|
| Emerald BioEnergy                                  | OH | Biogas Plant |
| London WWTP  | OH | Biogas Plant |
| Mill Creek Dairy                                   | OH | Biogas Plant |
| Quasar Energy Group - Ashley                       | OH | Biogas Plant |
| Quasar Energy Group - Central Ohio                 | OH | Biogas Plant |
| Quasar Energy Group - Collinwood                   | OH | Biogas Plant |
| Quasar Energy Group - Fairborn                     | OH | Biogas Plant |
| Quasar Energy Group - Haviland                     | OH | Biogas Plant |
| Quasar Energy Group - North Ridgeville             | OH | Biogas Plant |
| Quasar Energy Group - Norton                       | OH | Biogas Plant |
| Quasar Energy Group - Wooster                      | OH | Biogas Plant |
| Quasar Energy Group - Zanesville                   | OH | Biogas Plant |
| Quasar Wooster Renewable Energy                    | OH | Biogas Plant |
| Toledo Bay View Park WWTP & Sewers                 | OH | Biogas Plant |
| Tri-Cities North Regional WWTP                     | OH | Biogas Plant |
| Van Erk Dairy                                      | OH | Biogas Plant |
| Wenning Poultry Farm                               | OH | Biogas Plant |
| Barron County Waste-to-Energy & Recycling Facility | OH | Biogas Plant |
| Bay Front Power Plant                              | WI | Power Plant  |
| French Island Generating Station                   | WI | Power Plant  |
| Rothschild Biomass Cogeneration Plant              | WI | Power Plant  |
| American Wood Fibers-Wisconsin                     | WI | Power Plant  |
| Convergen Energy                                   | WI | Pellet Plant |
| Dejno's  | WI | Pellet Plant |
| Great Lakes Renewable Energy                       | WI | Pellet Plant |
| Indeck Energy Ladysmith LLC                        | WI | Pellet Plant |
| Lignetics of Wisconsin-Marathon                    | WI | Pellet Plant |
| Lignetics of Wisconsin-Peshtigo                    | WI | Pellet Plant |
| Pellet America Corp.                               | WI | Pellet Plant |
| Snow Timber Pellets                                | WI | Pellet Plant |
| Allen Farms/Titan 55                               | WI | Pellet Plant |
| Bach Digester LLC                                  | WI | Biogas Plant |
| Baldwin Dairy                                      | WI | Biogas Plant |
| Big Ox Energy                                      | WI | Biogas Plant |
| Central Sands Dairy LLC                            | WI | Biogas Plant |
| City of Fond du Lac Water Pollution Control Plant  | WI | Biogas Plant |
| City of Stevens Point WWTP                         | WI | Biogas Plant |
| Clover Hill Dairy LLC                              | WI | Biogas Plant |
| Crave Brothers Dairy Farm / Clear Horizons LLC     | WI | Biogas Plant |
| Dairy Dreams                                       | WI | Biogas Plant |
| Dane County Community Digester - Waunakee          | WI | Biogas Plant |
| Emerald Dairy                                      | WI | Biogas Plant |
| FCPC Renewable Generation LLC                      | WI | Biogas Plant |
| GL Dairy Biogas Project                            | WI | Biogas Plant |
| Gordondale Farms                                   | WI | Biogas Plant |
| Green Valley Dairy                                 | WI | Biogas Plant |
| Green Whey Energy                                  | WI | Biogas Plant |

|   |                    |
|---|--------------------|
|   | Operational        |
| Electric Power                                  | Operational        |
| Process Heat                                    | Operational        |
| Electricity                                     | Operational        |
| Utility Grid, produces 550 GGE per day          | Operational        |
| Electricity/CNG                                 | Operational        |
| Electricity                                     | Operational        |
|   | Operational        |
| Electricity/CNG                                 | Operational        |
| Power distributed locally                       | Operational        |
|   | Operational        |
| Electricity/CNG                                 | Operational        |
| Electricity/CNG                                 | Operational        |
|   | Operational        |
| Electricity                                     | Operational        |
| Electricity                                     | Operational        |
| Electricity                                     | Operational        |
| Cogeneration                                    | Operational        |
| <hr/>   |                    |
| Municipal solid waste                           | 2 Operational      |
| Wood waste, railroad ties                       | 56 Operational     |
| Refused-derived fuel, wood waste, railroad ties | 30.4 Operational   |
| Urban wood waste/mill residue                   | 50 Operational     |
| Hardwood/softwood                               | 22700 Operational  |
| Paper waste                                     | 108900 Operational |
| Hardwood/softwood                               | 54400 Operational  |
| Hardwood/softwood                               | 63500 Operational  |
| Hardwood/softwood                               | 81600 Operational  |
| Hardwood/softwood                               | 45400 Operational  |
| Hardwood  | 45400 Operational  |
| Paper waste                                     | 45000 Operational  |
| Hardwood  | 4500 Operational   |
| CHP   | Operational        |
| Electricity                                     | Operational        |
| Boiler/Furnace Fuel                             | Operational        |
| Electricity                                     | Operational        |
| Electricity                                     | Operational        |
| Electricity                                     | Operational        |
| Electricity                                     | Operational        |
| Cogeneration                                    | Operational        |
| Cogeneration                                    | Operational        |
| Electricity                                     | Operational        |
| Electricity                                     | Operational        |
| Cogeneration                                    | Operational        |
| CHP   | Operational        |
| Electricity                                     | Operational        |
| Cogeneration                                    | Operational        |
| Cogeneration                                    | Operational        |



Permit to install/operat for anaerobic digester for agricultural waste-to-energy

no permits found

no permits found

no permits found

no permits found

no permits found

no permits found

no permits found

no permits found

no permits found

no permits found

no permits found

no permits found

no permits found

no permits found

no permits found

no permits found

no permits found

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minor NSR, Major Title V

XCEL Energy-Bay Front Generating Station major source under NSR and Title V

XCEL Energy-French Islan Generating Station major source under NSR and Title V

Wisconsin Electric Power Company -Rothschild Biomass Cogeneration Palnt, major source under NSR and Title V

exempt from permitting

FESOP/registration permit

2 facilities, Antigo, WI: FESOP, Kenosha, WI: exempt from permitting

FESOP

major under Title V

no match under that name, may be Lignotech USA Inc. Lignotech has a FESOP

no permit records found

natural minor, no permit

exempt from permitting

no permit records found

exempt from permitting

no permit records found

no permit records found

no permit records found

Fond du Lac Regional Wastewater Treatment Facility, natural minor state permit only

Stevens Point Wastewater Treatment Facility, natrual minor, registration permit

no permit records found

no permit records found

Dairy Dreams is a natural minor with no permit; however, co-located wth Calumet Renewable Energy which is minor for I

no permit records found

no permit records found

FESOP

FESOP

no permit records found

no permit records found



NSR and r

|  |    |              |
|--|----|--------------|
| Grotegut Dairy Farm Inc.                           | WI | Biogas Plant |
| Gundersen Health System                            | WI | Biogas Plant |
| Heller Farms / Cow Poo LLC                         | WI | Biogas Plant |
| Holsum Dairy - Elm Road                            | WI | Biogas Plant |
| Holsum Dairy - Irish Road                          | WI | Biogas Plant |
| Janesville Wastewater Utility                      | WI | Biogas Plant |
| Maple Leaf Dairy                                   | WI | Biogas Plant |
| Maple Leaf West                                    | WI | Biogas Plant |
| Neenah-Menasha Sewerage Commission                 | WI | Biogas Plant |
| NEW Organic Digestion LLC                          | WI | Biogas Plant |
| Norm-E-Lane Inc. (NEL)                             | WI | Biogas Plant |
| Norswiss Farms                                     | WI | Biogas Plant |
| null   | WI | Biogas Plant |
| Pagels Ponderosa Dairy                             | WI | Biogas Plant |
| Sheboygan Regional Wastewater Treatment Facility   | WI | Biogas Plant |
| Statz Brothers Inc.                                | WI | Biogas Plant |
| Sunrise Dairy                                      | WI | Biogas Plant |
| USEMCO - Peters Farm                               | WI | Biogas Plant |
| UW Oshkosh Foundation Rosendale Biodigester        | WI | Biogas Plant |
| UW Oshkosh Urban Anaerobic Dry Biogas System (BD1) | WI | Biogas Plant |
| Vir-Clar Farms                                     | WI | Biogas Plant |
| Volm Farms   | WI | Biogas Plant |
| Wild Rose Dairy                                    | WI | Biogas Plant |
| WTE - Dairyland                                    | WI | Biogas Plant |
| WTE - Dallmann                                     | WI | Biogas Plant |
| WTE - Deer Run                                     | WI | Biogas Plant |
| WTE - S & S Ag                                     | WI | Biogas Plant |
| WTE - Wakker                                       | WI | Biogas Plant |
|  | WI | Biogas Plant |

|                                  |             |
|----------------------------------|-------------|
| CHP                              | Operational |
| Cogeneration                     | Operational |
|                                  | Operational |
| Cogeneration                     | Operational |
| Cogeneration                     | Operational |
| Cogeneration                     | Operational |
| Electricity/CNG                  | Operational |
| Cogeneration                     | Operational |
| Electricity                      | Operational |
| Electricity                      | Operational |
| Electricity                      | Operational |
| Cogeneration                     | Operational |
| Electricity                      | Operational |
| Cogeneration                     | Operational |
| Electricity                      | Operational |
| Electricity                      | Operational |
| Cogeneration                     | Operational |
| Cogeneration                     | Operational |
| Electricity                      | Operational |
| Cogeneration                     | Operational |
| Cogeneration                     | Operational |
| Cogeneration                     | Operational |
| Electricity                      | Operational |
| Cogeneration/Boiler/Furnace Fuel | Operational |
| Cogeneration                     | Operational |
| Cogeneration                     | Operational |
| Electricity                      | Operational |
| Electricity                      | Operational |

[illegible]

no permit records found

FESOP (and a Title V permit for the CALUMET RENEWABLE ENERGY LLC at the GROTEGUT DAIRY/MAPLE LEAF FACILITY)

FESOP (for GUNDERSEN LUTHERAN ONALASKA CAMPUS & LANDFILL BIOGAS POWER GENERATION FACILITY)

no permit records found

a construction permit application was requested

a construction permit application was requested

Registration permit (for Janesville Water Pollution Plant)

minor NSR

no permit records found for this name but there is a Maple Leaf / Grotegut facility permitted)

Registration permit

Title V permit

minor NSR

no permits records for Norswiss but 3 permit records for Swiss Valley

Registration permit (the co-located Calumet Renewable Energy has a Title V permit)

Registration permit (for the Sheboygan Wastewater Treatment Plant)

FESOP (for Statz B Farm)

No permits (exempt)

No permit records for USEMCO Peters farm (but a FESOP for USEMCO UNIVERSAL SANITARY EQUIPMT MFG CO)

minor NSR

No facility by this name (but other UW-OSHKOSH facilities such as UW Oshkosh FOUNDATION RENEWABLE ENERGY FACI

minor NSR

No facility by this name (there is a VOLM COMPANIES - PLASPACK USA INC)

no permit records for facility

FESOP

minor NSR

minor NSR

minor NSR

minor NSR

LITY

Message

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**From:** Ohrel, Sara [Ohrel.Sara@epa.gov]  
**Sent:** 10/24/2018 3:14:28 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

Perfect – thanks!

---

**From:** Montanez, Jessica  
**Sent:** Wednesday, October 24, 2018 11:03 AM  
**To:** Ohrel, Sara <Ohrel.Sara@epa.gov>  
**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

I think the latest file is this one...It is in the regional data rqst folder

---

**From:** Ohrel, Sara  
**Sent:** Wednesday, October 24, 2018 11:01 AM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>  
**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

Thanks again Jessica.

As for the correct file, is it the one titled “ghgp\_data\_2016\_8\_5\_17 w btoups edits”?

---

**From:** Montanez, Jessica  
**Sent:** Tuesday, October 23, 2018 4:06 PM  
**To:** Ohrel, Sara <Ohrel.Sara@epa.gov>  
**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

I can be free in a few minutes. I need to send a couple of emails before then. Does that work?

---

**From:** Ohrel, Sara  
**Sent:** Tuesday, October 23, 2018 4:04 PM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>  
**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

Or are you free now?

---

**From:** Montanez, Jessica  
**Sent:** Tuesday, October 23, 2018 3:59 PM  
**To:** Ohrel, Sara <Ohrel.Sara@epa.gov>  
**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

Hi Sara,

I am not really looking for feedback unless you see that something is wrong. I just wanted to share what we put together with the data that the regions sent us. We sent this forward to our management, but I am not sure if and in what context it was used. Does that help?

Jessica

---

**From:** Ohrel, Sara  
**Sent:** Tuesday, October 23, 2018 3:54 PM  
**To:** Montanez, Jessica <[Montanez.Jessica@epa.gov](mailto:Montanez.Jessica@epa.gov)>  
**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

Hi Jessica,

Thank you so much for sharing this information. By when would you like our feedback on this?

Thanks again,  
Sara

---

**From:** Montanez, Jessica  
**Sent:** Monday, October 22, 2018 4:21 PM  
**To:** Bird, Patrick <[Bird.Patrick@epa.gov](mailto:Bird.Patrick@epa.gov)>; Moskal, John <[Moskal.John@epa.gov](mailto:Moskal.John@epa.gov)>; Shepherd, Lorinda <[Shepherd.Lorinda@epa.gov](mailto:Shepherd.Lorinda@epa.gov)>; Johnson, Terry <[Johnson.Terry@epa.gov](mailto:Johnson.Terry@epa.gov)>; Toups, Brad <[Toups.Brad@epa.gov](mailto:Toups.Brad@epa.gov)>; McFadden, Kelly <[McFadden.Kelly@epa.gov](mailto:McFadden.Kelly@epa.gov)>; Ceron, Heather <[Ceron.Heather@epa.gov](mailto:Ceron.Heather@epa.gov)>; Greenglass, Nora <[Greenglass.Nora@epa.gov](mailto:Greenglass.Nora@epa.gov)>; Moran, Robin <[moran.robin@epa.gov](mailto:moran.robin@epa.gov)>; Irving, Bill <[Irving.Bill@epa.gov](mailto:Irving.Bill@epa.gov)>; Ohrel, Sara <[Ohrel.Sara@epa.gov](mailto:Ohrel.Sara@epa.gov)>; Steller, John <[Steller.John@epa.gov](mailto:Steller.John@epa.gov)>; Doster, Brian <[Doster.Brian@epa.gov](mailto:Doster.Brian@epa.gov)>; Elman, Barry <[Elman.Barry@epa.gov](mailto:Elman.Barry@epa.gov)>  
**Cc:** Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>  
**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

Workgroup,

We just wanted to give you an update on the bullet points we created based on the information you and other regions collected on biogenic CO2 emitting sources that are or could be subject to permitting. This is the best information we could gather in the short amount of time we had for this exercise a few weeks ago. If you see any mistakes in the information or the way it was summarized, please let us know.

We will also give you an update on the schedule once we know more about next steps.

Jessica

Bullet points based on data collected:

- The EPA does not have records of all the PSD permits that have been issued that address biogenic CO<sub>2</sub> emissions. However, when we look at GHG Reporting Program (GHGRP) and private sector data on biogenic CO<sub>2</sub> emitting sources, to give us a general sense of the overall universe of sources that use biomass, it seems that as of 2016 there might be approximately 3,072 sources in the nation that are or could be potentially subject to PSD for their GHG emissions.
- Of those 3,072 potential PSD GHG-emitting sources, only 464 have any biogenic CO<sub>2</sub> emissions as part of their sum of the emissions of the well-mixed group of six gases that make up the pollutant GHGs. These 464 sources represent about 15% of the total number of sources that are or could potentially be subject to PSD due to their GHG emissions (the 3,072 sources). In 2016, a total of 6,546 sources reported their GHG emissions to the GHGRP. Thus, it can be assumed that most of the sources that reported GHG emissions into the GHGRP were minor sources for purposes of the NSR program.
- Below are three examples of permits the EPA or states have issued for biogenic CO<sub>2</sub> emitting sources. If those sources were to be permitted under any of the biogenic CO<sub>2</sub> emissions exemptions we are considering, one of them could potentially be exempt from GHG BACT, although none would be exempt from PSD permitting.



| Source Name                     | Region/<br>State         | Source Type/<br>Feedstock                              | CO <sub>2</sub> e<br>emissions              | Could this source qualify for any of the potential<br>regulatory exemptions?   |
|---------------------------------|--------------------------|--|---|--|
| Energy<br>Answers               | Region 2/<br>Puerto Rico | Waste-to-<br>energy<br>facility                        | 924,750 –<br>approx.<br>458,000<br>biogenic | <ul style="list-style-type: none"> <li>• Could potentially qualify for the broader biomass exemption (Approach 3).</li> <li>• Source still be subject to PSD BACT for other regulated NSR pollutants and GHGs.</li> </ul>  |
| WestRock:<br>Hopewell Mill      | Region 3/<br>Virginia    | Pulp and<br>Paper Mill                                 | 853,466 –<br>approx.<br>767,368<br>biogenic | <ul style="list-style-type: none"> <li>• Could potentially qualify for forest biomass exemption (Approach 2).</li> <li>• Source still be subject to PSD BACT for other regulated NSR pollutants and GHGs.</li> </ul>   |
| Seneca<br>Sustainable<br>Energy | Region 10/<br>Oregon     | Power Plant,<br>uses forest<br>residue as<br>feedstock | 325,591 –<br>approx.<br>252,000<br>biogenic | <ul style="list-style-type: none"> <li>• Could potentially qualify for forest biomass exemption (Approach 2).</li> <li>• Source still be subject to PSD BACT for other regulated NSR pollutants. Might not be subject to GHG BACT with exemption because total GHG emissions could be less than 75,000 tpy CO<sub>2</sub>e.</li> </ul> |

**From:** Montanez, Jessica

**Sent:** Friday, September 28, 2018 5:37 PM

**To:** Bird, Patrick <Bird.Patrick@epa.gov>; Moskal, John <Moskal.John@epa.gov>; Shepherd, Lorinda <Shepherd.Lorinda@epa.gov>; Johnson, Terry <Johnson.Terry@epa.gov>; Toups, Brad <Toups.Brad@epa.gov>; McFadden, Kelly <McFadden.Kelly@epa.gov>; Ceron, Heather <Ceron.Heather@epa.gov>; Greenglass, Nora <Greenglass.Nora@epa.gov>; Moran, Robin <moran.robin@epa.gov>; Irving, Bill <Irving.Bill@epa.gov>; Ohrel, Sara <Ohrel.Sara@epa.gov>; Steller, John <Steller.John@epa.gov>; Doster, Brian <Doster.Brian@epa.gov>; Elman, Barry <Elman.Barry@epa.gov>

**Cc:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>

**Subject:** Biogenic CO<sub>2</sub> Emitting Sources - Request for Information by noon on Friday, October 5.

Workgroup, particularly the regions:

While we wait for the next Early Guidance briefing to be scheduled, OAR management has asked us to start exploring approximately how many and what types of sources (i.e., facilities) could potentially take advantage of any type of biogenic CO<sub>2</sub> exemption, like the exemptions we are exploring through our rulemaking workgroup.

**OAR has two requests and would like to receive the most data we can gather by noon on Friday, October 5.**

For the first and most important request, can you provide some examples of all the types of biogenic CO<sub>2</sub> emitting sources that you are aware are subject to permitting and what is the amount of biogenic CO<sub>2</sub> emissions they are emitting or plan to emit from their overall CO<sub>2</sub> equivalent emissions projections that subjected them to permitting? We are thinking sources under the categories of biobased transportation fuels production, biopower production and biobased product development, but let us know if there could be other categories. For each of these examples can you include:

1. What is their source type (power plant, biofuel production, pellet plant, cement plant, landfill, etc.)
2. The type(s) of biomass they are burning/plan to burn
3. Projected amount of GHG emissions including the biomass emissions separately, if available.

The second request is to compile a list of any type of biogenic CO<sub>2</sub> emission sources that you are aware that you or your states have permitted or can quickly confirm that were permitted.

- To aid in this request, I did a quick online data search and found that Biomass Magazine publishes a list of what they consider the number of biomass power plants, pellet plants and biogas plants as of September 2018 that are operational, under construction or proposed (see attached Excel file). I do not know the quality of this information, therefore, can you quickly confirm if most of these sources have been permitted or are in the process of being permitted by you or your states? The capacity of some of these sources might be small enough to not require an NSR permit. In addition, if you are aware of other biogenic CO<sub>2</sub> emitting sources that have been permitted in or outside of those categories (power plants, pellet plants or biogas plants), can you add them to the list? If it is not possible to confirm or obtain this data in the time we have available to collect it, just let us know. We know that this data is not readily available.
- I also did a quick search in the RBLC and found that the following sources were permitted for one or more types of biomass feedstocks. I have not added them to the list since I am not sure what their current status is (operational, under construction or even on hold/will never get built). Can you confirm the status of the following list of sources, if possible, and add them to the list as appropriate? These sources could also serve as some of the examples for the first request above.
  1. CA - Sierra Pacific Anderson (RBLC ID: CA-1225)
  2. IN - Abengoa Bioenergy of Indiana (RBLC ID: IN-0186)
  3. KS - Agengoa Bioenergy of Kansas (RBLC ID: KS-0034)
  4. MI - Wolverine Power (RBLC ID: MI-0400)
  5. OK – Broken Bow OSB Mill, Huber Engineered Woods (RBLC ID: OK-0145)
  6. PR – Energy Answers (RBLC ID: PR-0009)
  7. MI – Grayling Particleboard, Arauco North America (RBLC ID: MI-0425)

Thanks in advance and let me know if you have any questions,

Jessica

Message

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**From:** Toups, Brad [Toups.Brad@epa.gov]  
**Sent:** 9/19/2018 8:23:45 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** RE: Treatment of Biogenic CO2 Emissions in Permitting - Follow-Up Meeting - Ex. 6 Personal Privacy (PP)

Ok, thanks Jessica.  
Brad

---

**From:** Montanez, Jessica  
**Sent:** Wednesday, September 19, 2018 3:15 PM  
**To:** Toups, Brad <Toups.Brad@epa.gov>  
**Subject:** RE: Treatment of Biogenic CO2 Emissions in Permitting - Follow-Up Meeting - Ex. 6 Personal Privacy (PP)

Hi Brad,

We just had the meeting with Wehrum and he asked a few questions on the legal basis for Approach 5 and the technical basis for all the approaches, but no decisions have been made.

On polling the other regions, I like your idea, but let me check here if my management is Ok with you doing that or if they think we should wait for other steps in the process like option selection to do something like that.

Thanks again,

Jessica

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407  
Note: Positions or views expressed here do not represent official EPA policy.

Looking for a speaker for your school or community event? <http://www.epa.gov/rtpspeakers/>

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**From:** Toups, Brad  
**Sent:** Wednesday, September 19, 2018 11:04 AM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>  
**Subject:** RE: Treatment of Biogenic CO2 Emissions in Permitting - Follow-Up Meeting - Ex. 6 Personal Privacy (PP)

Hi Jessica,  
Ok, that makes sense. With respect to the regions not represented, how about we wait to hear what direction Bill Wehrum will give this afternoon and afterwards I can notify the regions of the progress being made on the early guidance draft doc and solicit input on the implications of the options and have them ready for in time for the early guidance briefing itself. To my knowledge, such a request will be the first communication the APMs have had on the matter since the April memo setting all this in motion. Perhaps with a week turnaround time?

Let me know what you think is best in this regard and I will implement it.  
Brad

---

**From:** Montanez, Jessica  
**Sent:** Wednesday, September 19, 2018 8:14 AM  
**To:** Toups, Brad <Toups.Brad@epa.gov>  
**Subject:** RE: Treatment of Biogenic CO2 Emissions in Permitting - Follow-Up Meeting - Ex. 6 Personal Privacy (PP)

Hi Brad,

The meeting today is not an Early Guidance briefing. It is an informational briefing between Wehrum and OAR, including OGC, to get Wehrum ready for the Early Guidance briefing. No decisions will be made during today's meeting. For that reason, we have not shared any information about the call.

The early guidance briefing is yet to be scheduled and we will keep you posted on when the Early Guidance briefing is scheduled. We are sorry for the confusion as we had requested an early guidance briefing and were operating under the assumption that today's meeting was that meeting, but it is not.

Jessica

PS. Do you think you would bring up to speed and/or poll the regions not represented in the workgroup for their preferences/concerns for the Early Guidance meeting? Just wondering. We wondered about that briefly during our workgroup meeting yesterday.

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407  
Note: Positions or views expressed here do not represent official EPA policy.

Looking for a speaker for your school or community event? <http://www.epa.gov/rtpspeakings/>

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**From:** Toups, Brad  
**Sent:** Wednesday, September 19, 2018 7:39 AM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>  
**Subject:** RE: Treatment of Biogenic CO2 Emissions in Permitting - Follow-Up Meeting - Ex. 6 Personal Privacy (PP)

Jessica, I don't see the call in time or number for the Wehrum briefing. Can you forward it? Thanks  
Brad Toups

---

**From:** Montanez, Jessica  
**Sent:** Monday, September 17, 2018 4:29 PM  
**To:** Ohrel, Sara <Ohrel.Sara@epa.gov>; Steller, John <Steller.John@epa.gov>; Doster, Brian <Doster.Brian@epa.gov>; Elman, Barry <Elman.Barry@epa.gov>; Bird, Patrick <Bird.Patrick@epa.gov>; Moskal, John <Moskal.John@epa.gov>; Shepherd, Lorinda <Shepherd.Lorinda@epa.gov>; Johnson, Terry <Johnson.Terry@epa.gov>; Toups, Brad <Toups.Brad@epa.gov>; McFadden, Kelly <McFadden.Kelly@epa.gov>; Ceron, Heather <Ceron.Heather@epa.gov>; Greenglass, Nora <Greenglass.Nora@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Moran, Robin <moran.robin@epa.gov>; Irving, Bill <Irving.Bill@epa.gov>  
**Subject:** RE: Treatment of Biogenic CO2 Emissions in Permitting - Follow-Up Meeting - Ex. 6 Personal Privacy (PP)

Workgroup,

Thanks for your edits on the briefing paper in preparation for Wednesday's meeting with Bill Wehrum. The current version of the briefing paper is attached.

Talk to you tomorrow,

Jessica

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407  
Note: Positions or views expressed here do not represent official EPA policy.

Looking for a speaker for your school or community event? <http://www.epa.gov/rtpspeakings/>

-----Original Appointment-----

**From:** Montanez, Jessica

**Sent:** Tuesday, September 11, 2018 4:35 PM

**To:** Montanez, Jessica; Ohrel, Sara; Steller, John; Doster, Brian; Elman, Barry; Bird, Patrick; Moskal, John; Shepherd, Lorinda; Johnson, Terry; Toups, Brad; McFadden, Kelly; Ceron, Heather; Greenglass, Nora; Kornylak, Vera S.; Vetter, Cheryl; Moran, Robin; RTP-OAQPS; Ex. 6 Personal Privacy (PP) -OID/Phone-Line/RTP-OAQPS-BLDG-C; Irving, Bill

**Subject:** Treatment of Biogenic CO2 Emissions in Permitting - Follow-Up Meeting Ex. 6 Personal Privacy (PP)

**When:** Tuesday, September 18, 2018 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** RTP-OAQPS-C535I/RTP-OAQPS-BLDG-C

Workgroup,

The latest version of the briefing paper is attached. It includes recommendations received during our Office Directors briefing on September 10 and a request for help in updating the implications/considerations table for all the approaches based on that feedback. This meeting is to discuss the edits on the paper, but also plan next steps in preparation for the Bill Wehrum briefing.

Jessica

Message

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**From:** Ohrel, Sara [Ohrel.Sara@epa.gov]  
**Sent:** 10/23/2018 8:13:16 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

Ok thanks!

---

**From:** Montanez, Jessica  
**Sent:** Tuesday, October 23, 2018 4:06 PM  
**To:** Ohrel, Sara <Ohrel.Sara@epa.gov>  
**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

I can be free in a few minutes. I need to send a couple of emails before then. Does that work?

---

**From:** Ohrel, Sara  
**Sent:** Tuesday, October 23, 2018 4:04 PM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>  
**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

Or are you free now?

---

**From:** Montanez, Jessica  
**Sent:** Tuesday, October 23, 2018 3:59 PM  
**To:** Ohrel, Sara <Ohrel.Sara@epa.gov>  
**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

Hi Sara,

I am not really looking for feedback unless you see that something is wrong. I just wanted to share what we put together with the data that the regions sent us. We sent this forward to our management, but I am not sure if and in what context it was used. Does that help?

Jessica

---

**From:** Ohrel, Sara  
**Sent:** Tuesday, October 23, 2018 3:54 PM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>  
**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

Hi Jessica,

Thank you so much for sharing this information. By when would you like our feedback on this?

Thanks again,  
Sara

**From:** Montanez, Jessica

**Sent:** Monday, October 22, 2018 4:21 PM

**To:** Bird, Patrick <Bird.Patrick@epa.gov>; Moskal, John <Moskal.John@epa.gov>; Shepherd, Lorinda <Shepherd.Lorinda@epa.gov>; Johnson, Terry <Johnson.Terry@epa.gov>; Toups, Brad <Toups.Brad@epa.gov>; McFadden, Kelly <McFadden.Kelly@epa.gov>; Ceron, Heather <Ceron.Heather@epa.gov>; Greenglass, Nora <Greenglass.Nora@epa.gov>; Moran, Robin <moran.robin@epa.gov>; Irving, Bill <Irving.Bill@epa.gov>; Ohrel, Sara <Ohrel.Sara@epa.gov>; Steller, John <Steller.John@epa.gov>; Doster, Brian <Doster.Brian@epa.gov>; Elman, Barry <Elman.Barry@epa.gov>

**Cc:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>

**Subject:** RE: Biogenic CO2 Emitting Sources - Permit Data Information

Workgroup,

We just wanted to give you an update on the bullet points we created based on the information you and other regions collected on biogenic CO2 emitting sources that are or could be subject to permitting. This is the best information we could gather in the short amount of time we had for this exercise a few weeks ago. If you see any mistakes in the information or the way it was summarized, please let us know.

We will also give you an update on the schedule once we know more about next steps.

Jessica

Bullet points based on data collected:

- The EPA does not have records of all the PSD permits that have been issued that address biogenic CO<sub>2</sub> emissions. However, when we look at GHG Reporting Program (GHGRP) and private sector data on biogenic CO<sub>2</sub> emitting sources, to give us a general sense of the overall universe of sources that use biomass, it seems that as of 2016 there might be approximately 3,072 sources in the nation that are or could be potentially subject to PSD for their GHG emissions.
- Of those 3,072 potential PSD GHG-emitting sources, only 464 have any biogenic CO<sub>2</sub> emissions as part of their sum of the emissions of the well-mixed group of six gases that make up the pollutant GHGs. These 464 sources represent about 15% of the total number of sources that are or could potentially be subject to PSD due to their GHG emissions (the 3,072 sources). In 2016, a total of 6,546 sources reported their GHG emissions to the GHGRP. Thus, it can be assumed that most of the sources that reported GHG emissions into the GHGRP were minor sources for purposes of the NSR program.
- Below are three examples of permits the EPA or states have issued for biogenic CO<sub>2</sub> emitting sources. If those sources were to be permitted under any of the biogenic CO<sub>2</sub> emissions exemptions we are considering, one of them could potentially be exempt from GHG BACT, although none would be exempt from PSD permitting.

| Source Name                     | Region/<br>State         | Source Type/<br>Feedstock                              | CO <sub>2</sub> e<br>emissions              | Could this source qualify for any of the potential<br>regulatory exemptions?   |
|---------------------------------|--------------------------|--|---|--|
| Energy<br>Answers               | Region 2/<br>Puerto Rico | Waste-to-<br>energy<br>facility                        | 924,750 –<br>approx.<br>458,000<br>biogenic | <ul style="list-style-type: none"><li>• Could potentially qualify for the broader biomass exemption (Approach 3).</li><li>• Source still be subject to PSD BACT for other regulated NSR pollutants and GHGs.</li></ul>           |
| WestRock:<br>Hopewell Mill      | Region 3/<br>Virginia    | Pulp and<br>Paper Mill                                 | 853,466 –<br>approx.<br>767,368<br>biogenic | <ul style="list-style-type: none"><li>• Could potentially qualify for forest biomass exemption (Approach 2).</li><li>• Source still be subject to PSD BACT for other regulated NSR pollutants and GHGs.</li></ul>                |
| Seneca<br>Sustainable<br>Energy | Region 10/<br>Oregon     | Power Plant,<br>uses forest<br>residue as<br>feedstock | 325,591 –<br>approx.<br>252,000<br>biogenic | <ul style="list-style-type: none"><li>• Could potentially qualify for forest biomass exemption (Approach 2).</li><li>• Source still be subject to PSD BACT for other regulated NSR pollutants. Might not be subject to</li></ul> |

**From:** Montanez, Jessica

**Sent:** Friday, September 28, 2018 5:37 PM

**To:** Bird, Patrick <Bird.Patrick@epa.gov>; Moskal, John <Moskal.John@epa.gov>; Shepherd, Lorinda <Shepherd.Lorinda@epa.gov>; Johnson, Terry <Johnson.Terry@epa.gov>; Toups, Brad <Toups.Brad@epa.gov>; McFadden, Kelly <McFadden.Kelly@epa.gov>; Ceron, Heather <Ceron.Heather@epa.gov>; Greenglass, Nora <Greenglass.Nora@epa.gov>; Moran, Robin <moran.robin@epa.gov>; Irving, Bill <Irving.Bill@epa.gov>; Ohrel, Sara <Ohrel.Sara@epa.gov>; Steller, John <Steller.John@epa.gov>; Doster, Brian <Doster.Brian@epa.gov>; Elman, Barry <Elman.Barry@epa.gov>

**Cc:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>

**Subject:** Biogenic CO<sub>2</sub> Emitting Sources - Request for Information by noon on Friday, October 5.

Workgroup, particularly the regions:

While we wait for the next Early Guidance briefing to be scheduled, OAR management has asked us to start exploring approximately how many and what types of sources (i.e., facilities) could potentially take advantage of any type of biogenic CO<sub>2</sub> exemption, like the exemptions we are exploring through our rulemaking workgroup.

**OAR has two requests and would like to receive the most data we can gather by noon on Friday, October 5.**

For the first and most important request, can you provide some examples of all the types of biogenic CO<sub>2</sub> emitting sources that you are aware are subject to permitting and what is the amount of biogenic CO<sub>2</sub> emissions they are emitting or plan to emit from their overall CO<sub>2</sub> equivalent emissions projections that subjected them to permitting? We are thinking sources under the categories of biobased transportation fuels production, biopower production and biobased product development, but let us know if there could be other categories. For each of these examples can you include:

1. What is their source type (power plant, biofuel production, pellet plant, cement plant, landfill, etc.)
2. The type(s) of biomass they are burning/plan to burn
3. Projected amount of GHG emissions including the biomass emissions separately, if available.

The second request is to compile a list of any type of biogenic CO<sub>2</sub> emission sources that you are aware that you or your states have permitted or can quickly confirm that were permitted.

- To aid in this request, I did a quick online data search and found that Biomass Magazine publishes a list of what they consider the number of biomass power plants, pellet plants and biogas plants as of September 2018 that are operational, under construction or proposed (see attached Excel file). I do not know the quality of this information, therefore, can you quickly confirm if most of these sources have been permitted or are in the process of being permitted by you or your states? The capacity of some of these sources might be small enough to not require an NSR permit. In addition, if you are aware of other biogenic CO<sub>2</sub> emitting sources that have been permitted in or outside of those categories (power plants, pellet plants or biogas plants), can you add them to the list? If it is not possible to confirm or obtain this data in the time we have available to collect it, just let us know. We know that this data is not readily available.
- I also did a quick search in the RBLC and found that the following sources were permitted for one or more types of biomass feedstocks. I have not added them to the list since I am not sure what their current status is (operational, under construction or even on hold/will never get built). Can you confirm



the status of the following list of sources, if possible, and add them to the list as appropriate? These sources could also serve as some of the examples for the first request above.

1. CA - Sierra Pacific Anderson (RBLC ID: CA-1225)
2. IN - Abengoa Bioenergy of Indiana (RBLC ID: IN-0186)
3. KS - Agengoa Bioenergy of Kansas (RBLC ID: KS-0034)
4. MI - Wolverine Power (RBLC ID: MI-0400)
5. OK – Broken Bow OSB Mill, Huber Engineered Woods (RBLC ID: OK-0145)
6. PR – Energy Answers (RBLC ID: PR-0009)
7. MI – Grayling Particleboard, Arauco North America (RBLC ID: MI-0425)

Thanks in advance and let me know if you have any questions,

Jessica

Message

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**From:** Bird, Patrick [Bird.Patrick@epa.gov]  
**Sent:** 10/18/2018 4:01:43 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** RE: EPS Regional Workgroup Call

Ok, thanks.

Patrick Bird  
U.S. EPA - Region 1  
5 Post Office Square, OEP05-2  
Boston, MA 02109-3912  
Phone: 617-918-1287  
Fax: 617-918-0287  
Email: bird.patrick@epa.gov

---

**From:** Montanez, Jessica  
**Sent:** Thursday, October 18, 2018 11:43 AM  
**To:** Bird, Patrick <Bird.Patrick@epa.gov>  
**Subject:** RE: EPS Regional Workgroup Call

No movement on biogenic CO2. I have not heard any direction from upper management on how to proceed after our last meeting and the data request they had.

Jessica

---

**From:** Bird, Patrick  
**Sent:** Thursday, October 18, 2018 11:13 AM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>  
**Subject:** RE: EPS Regional Workgroup Call

Thanks, Jessica. Wish I could have made it. Sounds much more interesting than my other call.

On a separate note – any movement on the biogenic workgroup?

Patrick Bird  
U.S. EPA - Region 1  
5 Post Office Square, OEP05-2  
Boston, MA 02109-3912  
Phone: 617-918-1287  
Fax: 617-918-0287  
Email: [bird.patrick@epa.gov](mailto:bird.patrick@epa.gov)

# Ex. 5 Deliberative Process (DP)

# **Ex. 5 Deliberative Process (DP)**

# **Ex. 5 Deliberative Process (DP)**

Message

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**From:** Moran, Robin [moran.rob@epa.gov]  
**Sent:** 9/6/2018 3:34:39 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** RE: Latest version of Biogenic CO2 Emissions Briefing Paper

Great, thanks

---

**From:** Montanez, Jessica  
**Sent:** Thursday, September 06, 2018 11:32 AM  
**To:** Moran, Robin <moran.rob@epa.gov>  
**Subject:** RE: Latest version of Biogenic CO2 Emissions Briefing Paper

Ok. I will edit that. Thanks.

On the edits on the table, I think those are ok.

Jessica

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407  
Note: Positions or views expressed here do not represent official EPA policy.

Looking for a speaker for your school or community event? <http://www.epa.gov/rtpspeakings/>

---

**From:** Moran, Robin  
**Sent:** Thursday, September 06, 2018 11:29 AM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>  
**Subject:** RE: Latest version of Biogenic CO2 Emissions Briefing Paper

Yep that works.

---

**From:** Montanez, Jessica  
**Sent:** Thursday, September 06, 2018 11:15 AM  
**To:** Moran, Robin <moran.rob@epa.gov>  
**Subject:** RE: Latest version of Biogenic CO2 Emissions Briefing Paper

# Ex. 5 Deliberative Process (DP)

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407

Note: Positions or views expressed here do not represent official EPA policy.

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**From:** Moran, Robin  
**Sent:** Thursday, September 06, 2018 11:11 AM  
**To:** Montanez, Jessica <[Montanez.Jessica@epa.gov](mailto:Montanez.Jessica@epa.gov)>  
**Subject:** RE: Latest version of Biogenic CO2 Emissions Briefing Paper

Yep I'm here

---

**From:** Montanez, Jessica  
**Sent:** Thursday, September 06, 2018 11:08 AM  
**To:** Moran, Robin <[moran.robin@epa.gov](mailto:moran.robin@epa.gov)>  
**Subject:** RE: Latest version of Biogenic CO2 Emissions Briefing Paper

I can't call. Can we talk through email?

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407  
Note: Positions or views expressed here do not represent official EPA policy.

Looking for a speaker for your school or community event? <http://www.epa.gov/rtpspeakings/>

---

**From:** Moran, Robin  
**Sent:** Thursday, September 06, 2018 11:08 AM  
**To:** Montanez, Jessica <[Montanez.Jessica@epa.gov](mailto:Montanez.Jessica@epa.gov)>  
**Subject:** RE: Latest version of Biogenic CO2 Emissions Briefing Paper

Sure, I'm at my desk 734-214-4781

---

**From:** Montanez, Jessica  
**Sent:** Thursday, September 06, 2018 11:07 AM  
**To:** Moran, Robin <[moran.robin@epa.gov](mailto:moran.robin@epa.gov)>  
**Subject:** RE: Latest version of Biogenic CO2 Emissions Briefing Paper

Hi Robin,

Are you available to discuss your edits now? I am at another meeting, but hoped to multi-task through email.

Jessica

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407

Note: Positions or views expressed here do not represent official EPA policy.

Looking for a speaker for your school or community event? <http://www.epa.gov/rtpspeakings/>

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**From:** Moran, Robin  
**Sent:** Thursday, September 06, 2018 10:58 AM  
**To:** Greenglass, Nora <[Greenglass.Nora@epa.gov](mailto:Greenglass.Nora@epa.gov)>; Doster, Brian <[Doster.Brian@epa.gov](mailto:Doster.Brian@epa.gov)>  
**Cc:** Montanez, Jessica <[Montanez.Jessica@epa.gov](mailto:Montanez.Jessica@epa.gov)>; Orlin, David <[Orlin.David@epa.gov](mailto:Orlin.David@epa.gov)>  
**Subject:** FW: Latest version of Biogenic CO2 Emissions Briefing Paper

Hi Nora and Brian,

Fyi these are the couple edits I sent along to OAQPS on Approach 5 + Apx B, in case you're also making edits to those pieces.

Robin

Robin Moran  
Senior Policy Advisor  
U.S. EPA, Office of Transportation and Air Quality  
2000 Traverwood Dr.  
Ann Arbor, MI 48105  
(734) 214-4781 (phone)

---

**From:** Moran, Robin  
**Sent:** Thursday, September 06, 2018 9:56 AM  
**To:** Montanez, Jessica <[Montanez.Jessica@epa.gov](mailto:Montanez.Jessica@epa.gov)>  
**Subject:** RE: Latest version of Biogenic CO2 Emissions Briefing Paper

Hi Jessica,

## Ex. 5 Deliberative Process (DP)

Thanks, talk to you at 10.

Robin

Robin Moran  
Senior Policy Advisor  
U.S. EPA, Office of Transportation and Air Quality  
2000 Traverwood Dr.  
Ann Arbor, MI 48105  
(734) 214-4781 (phone)

---

**From:** Montanez, Jessica

**Sent:** Thursday, September 06, 2018 9:41 AM

**To:** Ohrel, Sara <Ohrel.Sara@epa.gov>; Steller, John <Steller.John@epa.gov>; Doster, Brian <Doster.Brian@epa.gov>; Elman, Barry <Elman.Barry@epa.gov>; Bird, Patrick <Bird.Patrick@epa.gov>; Moskal, John <Moskal.John@epa.gov>; Shepherd, Lorinda <Shepherd.Lorinda@epa.gov>; Johnson, Terry <Johnson.Terry@epa.gov>; Toups, Brad <Toups.Brad@epa.gov>; McFadden, Kelly <McFadden.Kelly@epa.gov>; Ceron, Heather <Ceron.Heather@epa.gov>; Greenglass, Nora <Greenglass.Nora@epa.gov>; Moran, Robin <moran.robin@epa.gov>  
**Cc:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>  
**Subject:** RE: Latest version of Biogenic CO2 Emissions Briefing Paper

Workgroup,

There has been a slight update to the briefing paper. Please refer to this version (09-05-2018v1).

Thanks,

Jessica

Jessica Montañez

Office of Air Quality Planning and Standards

Air Quality Policy Division

New Source Review Group

109 TW Alexander Drive MD: C504-03 RTP, NC 27711

Phone: 919-541-3407

Note: Positions or views expressed here do not represent official EPA policy.

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---

**From:** Montanez, Jessica

**Sent:** Wednesday, September 05, 2018 1:51 PM

**To:** Ohrel, Sara <Ohrel.Sara@epa.gov>; Steller, John <Steller.John@epa.gov>; Doster, Brian <Doster.Brian@epa.gov>; Elman, Barry <Elman.Barry@epa.gov>; Bird, Patrick <Bird.Patrick@epa.gov>; Moskal, John <Moskal.John@epa.gov>; Shepherd, Lorinda <Shepherd.Lorinda@epa.gov>; Johnson, Terry <Johnson.Terry@epa.gov>; Toups, Brad <Toups.Brad@epa.gov>; McFadden, Kelly <McFadden.Kelly@epa.gov>; Ceron, Heather <Ceron.Heather@epa.gov>; Greenglass, Nora <Greenglass.Nora@epa.gov>; Moran, Robin <moran.robin@epa.gov>  
**Cc:** Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>  
**Subject:** Latest version of Biogenic CO2 Emissions Briefing Paper

Good afternoon,

The latest version of the Biogenic CO2 Emissions briefing paper is attached. We will use this version for our conversation at 10AM eastern tomorrow about roles and responsibilities for the upcoming briefings and during the Office Directors briefing on Monday. This version reflects feedback from the OAQPS Office Director, Peter Tsirigotis.

Thanks and let me know if you have any questions,

Jessica

Jessica Montañez

Office of Air Quality Planning and Standards

Air Quality Policy Division

New Source Review Group

109 TW Alexander Drive MD: C504-03 RTP, NC 27711



Phone: 919-541-3407

Note: Positions or views expressed here do not represent official EPA policy.

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Message

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**From:** Shepherd, Lorinda [Shepherd.Lorinda@epa.gov]  
**Sent:** 8/14/2018 2:43:10 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** RE: Biogenic CO2 Emissions Rulemaking Workgroup Meeting - 919-541-4488

Hi, Jessica.

Can I get a link to the OneDrive? I'm still not able to access.

Thanks,  
Lori Shepherd  
U.S. EPA Region 4  
Air Permitting Section  
(404)562-8435

---

**From:** Montanez, Jessica  
**Sent:** Thursday, August 9, 2018 12:25 PM  
**To:** Cole, Jefferson <Cole.Jefferson@epa.gov>; Ohrel, Sara <Ohrel.Sara@epa.gov>; Steller, John <Steller.John@epa.gov>; Doster, Brian <Doster.Brian@epa.gov>; Elman, Barry <Elman.Barry@epa.gov>; Bird, Patrick <Bird.Patrick@epa.gov>; Moskal, John <Moskal.John@epa.gov>; Shepherd, Lorinda <Shepherd.Lorinda@epa.gov>; Johnson, Terry <Johnson.Terry@epa.gov>; Touns, Brad <Touns.Brad@epa.gov>; McFadden, Kelly <McFadden.Kelly@epa.gov>; Ceron, Heather <Ceron.Heather@epa.gov>; Greenglass, Nora <Greenglass.Nora@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>  
**Cc:** Bauman, Michael <bauman.michael@epa.gov>  
**Subject:** RE: Biogenic CO2 Emissions Rulemaking Workgroup Meeting - Ex. 6 Personal Privacy (PP)

Workgroup,

Thanks for the input today and for your patience in the new ideas we are exploring as we try to be better prepared for the Early Guidance briefing.

# Ex. 5 Deliberative Process (DP)

Thanks and let me know if you have any questions,

Jessica

PS. If you still need access to our One Drive folder, please let me know and I will send you a separate email with the link. If I attach the link to this email, the link seems to get corrupted and does not work.

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407

Note: Positions or views expressed here do not represent official EPA policy.

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-----Original Appointment-----

**From:** Montanez, Jessica

**Sent:** Monday, July 23, 2018 11:36 AM

**To:** Montanez, Jessica; Cole, Jefferson; Ohrel, Sara; Steller, John; Doster, Brian; Elman, Barry; Bird, Patrick; Moskal, John; Shepherd, Lorinda; Johnson, Terry; Toups, Brad; McFadden, Kelly; Ceron, Heather; Greenglass, Nora; RTP-OAQPS-919-541-4488-01D-AQPD/Phone-Line/RTP-OAQPS-BLDG-C; Kornylak, Vera S.; Vetter, Cheryl

**Cc:** Bauman, Michael

**Subject:** Biogenic CO2 Emissions Rulemaking Workgroup Meeting - Ex. 6 Personal Privacy (PP)

**When:** Thursday, August 09, 2018 11:00 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** RTP-C500C-Max20/RTP-Bldg-C

Reserving this time for our workgroup meeting... Meeting agenda and documents to follow.

Jessica

Message

---

**From:** Bird, Patrick [Bird.Patrick@epa.gov]  
**Sent:** 8/9/2018 4:08:47 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** RE: Biogenic CO2 Emissions Rulemaking Workgroup Meeting - Ex. 5 Deliberative Process (DP) Agenda and Meeting Materials

Hi Jessica,

Yes, I have the folder now appears in shared files and I have access to all the documents. Previously I'd been working off of the static copies you'd send around.

Thanks!

Pat

Patrick Bird  
U.S. EPA - Region 1  
5 Post Office Square, OEP05-2  
Boston, MA 02109-3912  
Phone: 617-918-1287  
Fax: 617-918-0287  
Email: bird.patrick@epa.gov

---

**From:** Montanez, Jessica  
**Sent:** Thursday, August 09, 2018 11:43 AM  
**To:** Bird, Patrick <Bird.Patrick@epa.gov>  
**Subject:** RE: Biogenic CO2 Emissions Rulemaking Workgroup Meeting - Ex. 6 Personal Privacy (PP) - Agenda and Meeting Materials

Hi Patrick,

Just sent it to you. Let me know if it works.

Jessica

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407  
Note: Positions or views expressed here do not represent official EPA policy.

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---

**From:** Bird, Patrick  
**Sent:** Thursday, August 09, 2018 11:19 AM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>  
**Subject:** RE: Biogenic CO2 Emissions Rulemaking Workgroup Meeting - Ex. 6 Personal Privacy (PP) - Agenda and Meeting Materials

Jessica,

Could you please send me a link to the One Drive folder? I do not have it in my One Drive shared files.

Thanks,

Pat

Patrick Bird  
U.S. EPA - Region 1  
5 Post Office Square, OEP05-2  
Boston, MA 02109-3912  
Phone: 617-918-1287  
Fax: 617-918-0287  
Email: [bird.patrick@epa.gov](mailto:bird.patrick@epa.gov)

---

**From:** Montanez, Jessica

**Sent:** Monday, August 06, 2018 10:42 AM

**To:** Cole, Jefferson <[Cole.Jefferson@epa.gov](mailto:Cole.Jefferson@epa.gov)>; Ohrel, Sara <[Ohrel.Sara@epa.gov](mailto:Ohrel.Sara@epa.gov)>; Steller, John <[Steller.John@epa.gov](mailto:Steller.John@epa.gov)>;  
Doster, Brian <[Doster.Brian@epa.gov](mailto:Doster.Brian@epa.gov)>; Elman, Barry <[Elman.Barry@epa.gov](mailto:Elman.Barry@epa.gov)>; Bird, Patrick <[Bird.Patrick@epa.gov](mailto:Bird.Patrick@epa.gov)>;  
Moskal, John <[Moskal.John@epa.gov](mailto:Moskal.John@epa.gov)>; Shepherd, Lorinda <[Shepherd.Lorinda@epa.gov](mailto:Shepherd.Lorinda@epa.gov)>; Johnson, Terry  
<[Johnson.Terry@epa.gov](mailto:Johnson.Terry@epa.gov)>; Toups, Brad <[Toups.Brad@epa.gov](mailto:Toups.Brad@epa.gov)>; McFadden, Kelly <[McFadden.Kelly@epa.gov](mailto:McFadden.Kelly@epa.gov)>; Ceron,  
Heather <[Ceron.Heather@epa.gov](mailto:Ceron.Heather@epa.gov)>; Greenglass, Nora <[Greenglass.Nora@epa.gov](mailto:Greenglass.Nora@epa.gov)>; Kornylak, Vera S.  
<[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Vetter, Cheryl <[Vetter.Cheryl@epa.gov](mailto:Vetter.Cheryl@epa.gov)>

**Subject:** Biogenic CO2 Emissions Rulemaking Workgroup Meeting - Ex. 6 Personal Privacy (PP) - Agenda and Meeting Materials

Workgroup,

The agenda for our meeting on Thursday is attached. The agenda includes the updated rulemaking schedule.

I am also attaching three papers that were shared with us in 2014, I believe by AF&PA, as potential ideas for creating a PSD permitting exemption for biogenic CO2 emissions. I would like to discuss these with you during the call, so please read them ahead of time. Also note that these papers were written before the UARG v EPA Supreme Court decision, therefore, some of the suggestions might no longer be relevant or feasible.

We will also spend some time on the options paper. I hope to have a more up to date version before the call for us to discuss.

Jessica

PS All documents can be found in our One Drive folder as well.

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407

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-----Original Appointment-----

**From:** Montanez, Jessica

**Sent:** Monday, July 23, 2018 11:36 AM

**To:** Montanez, Jessica; Cole, Jefferson; Ohrel, Sara; Steller, John; Doster, Brian; Elman, Barry; Bird, Patrick; Moskal, John; Shepherd, Lorinda; Johnson, Terry; Toups, Brad; McFadden, Kelly; Ceron, Heather; Greenglass, Nora; RTP-OAQPS-919-  
[Ex. 6 Personal Privacy (PP)] ID-AQPD/Phone-Line/RTP-OAQPS-BLDG-C; Kornylak, Vera S.; Vetter, Cheryl

**Subject:** Biogenic CO2 Emissions Rulemaking Workgroup Meeting [Ex. 6 Personal Privacy (PP)]

**When:** Thursday, August 09, 2018 11:00 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** RTP-C500C-Max20/RTP-Bldg-C

Reserving this time for our workgroup meeting... Meeting agenda and documents to follow.

Jessica

## **Ex. 5 Deliberative Process (DP)**

Biomass – Jessica Montanez - We are delaying the schedule for our biogenic CO2 emissions rule to give OGC some time to refine Options and to allow for the HQ team to be better prepared to brief management. No new schedule yet, but the new schedule will be shared with the workgroup as soon as it is ready.

## **Ex. 5 Deliberative Process (DP)**

Message

---

**From:** Santiago, Juan [Santiago.Juan@epa.gov]  
**Sent:** 5/30/2018 4:07:29 PM  
**To:** Harlow, David [harlow.david@epa.gov]  
**CC:** Wood, Anna [Wood.Anna@epa.gov]; Rao, Raj [Rao.Raj@epa.gov]; Svendsgaard, Dave [Svendsgaard.Dave@epa.gov]; Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** Materials for 2 PM Bi-weekly NSR Update  
**Attachments:** Harlow NSR Check-in Agenda 05\_30\_18.docx; NSRG Project Tracker\_05302018.docx

David, attached is the agenda and project tracker for our 2 PM meeting. Let me know if there are any questions.

Thanks!  
Juan



## NSR Check-in with David Harlow

05/30/18

### Agenda

#### New Items

1.

**Ex. 5 Deliberative Process (DP)**

2.

3.

#### Previous Items Check-in

4.

**Ex. 5 Deliberative Process (DP)**

5.

6.

7. Biomass NPRM – Tier 1 rule – Tentative Proposal Target Date –  
10/2019 (per ADP Process)

8.

**Ex. 5 Deliberative Process (DP)**

9.

| Project                                    | Target<br>Completion | Current Status | Key<br>Milestones | OAQPS/OGC<br>Staff | Comments |
|--|----------------------|----------------|-------------------|--------------------|----------|
| <div>Ex. 5 Deliberative Process (DP)</div> |                      |                |                   |                    |          |

## **Ex. 5 Deliberative Process (DP)**

Table

Ex. 5 Deliberative Process (DP)

## **Ex. 5 Deliberative Process (DP)**

## **Ex. 5 Deliberative Process (DP)**

| Project   | Target Completion Date   | Current Status  | Key Milestones  | OAQPS/OGC Staff                                  | Comments |
|---|--------------------------|---|---|--|----------|
| <b>Biomass</b><br>Explore options for exempting or providing regulatory relief from permitting for biogenic CO2 emissions resulting from the combustion of biomass. | Tier 1 Rule NPRM 10/2019 | Policy statement on Forest Biomass issued by the Administrator on 4/23/18<br><br>Working on briefing paper for Bill Wehrum.<br><br>Next workgroup meeting on 6/5. | Brief AQPD I/O week of 7/09/18<br><br>Early Guidance - 7/19/18<br><br>Detailed Analytical Blueprint - 8/23/18<br><br>Options selection - 10/11/18<br><br>Draft proposal FRN to WG on 12/13/18 | Jessica Montañez, Carrie Wheeler/Nora Greenglass |          |

## **Ex. 5 Deliberative Process (DP)**



Message

---

**From:** Rao, Raj [Rao.Raj@epa.gov]  
**Sent:** 5/10/2018 3:12:31 PM  
**To:** Svendsgaard, Dave [Svendsgaard.Dave@epa.gov]; Keller, Peter [keller.peter@epa.gov]; Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** FW: Agenda and Project Tracker for David check in at 11.30 am  
**Attachments:** Agenda for check in with David H 051018.docx; NSRG Project Tracker 051018.docx

FYI

Raj Rao, P.E.  
Group Leader, New Source Review Group,  
Air Quality Policy Division,  
Office of Air Quality Planning and Standards (MD-C504-03)  
US Environmental Protection Agency  
109 TW Alexander Drive  
Research Triangle Park, NC 27709  
919-541-5344  
919-541-5509 - Fax

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Deliberative and Confidential

---

**From:** Rao, Raj  
**Sent:** Thursday, May 10, 2018 11:11 AM  
**To:** Santiago, Juan <Santiago.Juan@epa.gov>; Anna Wood (wood.Anna@epa.gov) <wood.Anna@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>  
**Subject:** Agenda and Project Tracker for David check in at 11.30 am

## Ex. 5 Deliberative Process (DP)

Please forward to David

Raj

Raj Rao, P.E.  
Group Leader, New Source Review Group,  
Air Quality Policy Division,  
Office of Air Quality Planning and Standards (MD-C504-03)  
US Environmental Protection Agency  
109 TW Alexander Drive  
Research Triangle Park, NC 27709  
919-541-5344  
919-541-5509 - Fax

Note: Positions or views expressed here do not represent official EPA policy. Interagency  
Deliberative and Confidential

Check in with David Harlow

05/10/18

Agenda

- 1.
- 2.
- 3.
4. **Ex. 5 Deliberative Process (DP)**
- 5.
6. Biomass NPRM – Tentative Target – Tier 2 - 3/2019 (per ADP Process) Now Tier 1 – TBD - ADP process meetings with Administrator
7. **Ex. 5 Deliberative Process (DP)**

| Project | Target Completion Date | Current Status | Key Milestones | OAQPS/OGC Staff | Comments |
|---------|------------------------|----------------|----------------|-----------------|----------|
|         |                        |                |                |                 |          |

# Ex. 5 Deliberative Process (DP)

| Project | Target Completion Date | Current Status | Key Milestones | OAQPS/OGC Staff | Comments |
|---------|------------------------|----------------|----------------|-----------------|----------|
|---------|------------------------|----------------|----------------|-----------------|----------|

Ex. 5 Deliberative Process (DP)

| Project | Target Completion Date | Current Status | Key Milestones | OAQPS/OGC Staff | Comments |
|---------|------------------------|----------------|----------------|-----------------|----------|
|---------|------------------------|----------------|----------------|-----------------|----------|

**Ex. 5 Deliberative Process (DP)**

| Project                         | Target Completion Date | Current Status | Key Milestones | OAQPS/OGC Staff | Comments |
|---------------------------------|------------------------|----------------|----------------|-----------------|----------|
| Ex. 5 Deliberative Process (DP) |                        |                |                |                 |          |

| Project   | Target Completion Date  | Current Status  | Key Milestones  | OAQPS/OGC Staff                                  | Comments  |
|---|---|---|---|--|---|
| <b>Biomass</b><br><br>Explore options for exempting or providing regulatory relief for biomass (biogenic CO2 emissions resulting from the combustion of biomass) from permitting. | Tier 1 Rule NPRM Tentative 3/2019 based on Tier 2. Schedule being revised | Asked regions for workgroup members by 5/2 and now we are moving forward with officially tiering this action.<br><br>Meeting with OGC on 5/7/18 to start refining options for moving forward. | Early Guidance - 6/14/18<br><br>Detailed Analytical Blueprint - 6/18/18<br><br>Options selection - 8/23/18<br><br>Draft proposal FRN to WG on 9/27/18 | Jessica Montañez, Carrie Wheeler/Nora Greenglass | Policy statement on Forest Biomass issued by the Administrator on 4/23/18 |

## **Ex. 5 Deliberative Process (DP)**



| Project   | Target Completion Date   | Current Status  | Key Milestones  | OAQPS/OGC Staff                                  | Comments |
|---|--------------------------|---|---|--|----------|
| <b>Biomass</b><br>Explore options for exempting or providing regulatory relief from permitting for biogenic CO2 emissions resulting from the combustion of biomass. | Tier 1 Rule NPRM 10/2019 | Policy statement on Forest Biomass issued by the Administrator on 4/23/18<br><br>Working on briefing paper for Bill Wehrum.<br><br>Next workgroup meeting on 6/5. | Brief AQPD I/O week of 7/09/18<br><br>Early Guidance - 7/19/18<br><br>Detailed Analytical Blueprint - 8/23/18<br><br>Options selection - 10/11/18<br><br>Draft proposal FRN to WG on 12/13/18 | Jessica Montañez, Carrie Wheeler/Nora Greenglass |          |

## **Ex. 5 Deliberative Process (DP)**

# **Ex. 5 Deliberative Process (DP)**

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# Ex. 5 Deliberative Process (DP)

| Project                                  | Target Completion Date | Current Status | Key Milestones | OAQPS/OGC Staff | Comments |
|--|------------------------|----------------|----------------|-----------------|----------|
| <h1>Ex. 5 Deliberative Process (DP)</h1> |                        |                |                |                 |          |

# **Ex. 5 Deliberative Process (DP)**



| Project   | Target Completion Date   | Current Status                                    | Key Milestones  | OAQPS/OGC Staff                                  | Comments   |
|---|--|---|---|--|--|
| <b>Biomass</b><br><br>Explore options for exempting or providing regulatory relief for biomass (biogenic CO2 emissions resulting from the combustion of biomass) from permitting. | Assuming Tier 2 Rule NPRM Tentative 3/2019.<br><br>This date will depend on when we get policy statement from OAP. | Tiering request for this rule has been submitted. | Early Guidance - 6/14/18<br><br>Detailed Analytical Blueprint - 6/18/18<br><br>Options selection - 8/23/18<br><br>Draft proposal FRN to WG on 9/27/18 | Jessica Montañez, Carrie Wheeler/Nora Greenglass | Sent preliminary comments to OAP's draft policy statement on 3/27.<br><br>Awaiting policy statement from OAP |

Message

---

**From:** Santiago, Juan [Santiago.Juan@epa.gov]  
**Sent:** 5/16/2018 2:45:48 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**CC:** Johnson, Yvonne W [Johnson.Yvonnew@epa.gov]  
**Subject:** RE: can you please update biogenics slide  
**Attachments:** Draft Biomass Policy Statement TPs - 4-23-18.docx

Thanks Jessica. The slide looks fine. See the attached TPs I put together when the policy came out. I suggest

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Juan

---

**From:** Montanez, Jessica  
**Sent:** Wednesday, May 16, 2018 10:39 AM  
**To:** Santiago, Juan <Santiago.Juan@epa.gov>  
**Cc:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Subject:** RE: can you please update biogenics slide

Juan,

Since Yvonne needs this slide by this afternoon, here is my take on it. Let us know if you have any edits.

Jessica

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407  
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---

**From:** Johnson, Yvonne W  
**Sent:** Wednesday, May 16, 2018 10:21 AM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>  
**Cc:** Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** RE: can you please update biogenics slide

Yes, that will be fine. I need to get the presentation to NACAA later this evening though. thanks.

---

Thank you,

**Yvonne W. Johnson**  
Special Assistant to the Director  
Air Quality Policy Division

Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
[johnson.yvonnew@epa.gov](mailto:johnson.yvonnew@epa.gov)

---

**From:** Montanez, Jessica  
**Sent:** Wednesday, May 16, 2018 8:37 AM  
**To:** Johnson, Yvonne W <[Johnson.Yvonnew@epa.gov](mailto:Johnson.Yvonnew@epa.gov)>  
**Cc:** Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>  
**Subject:** RE: can you please update biogenics slide

Hi Yvonne,

Thanks. I sending you something this afternoon OK? I have a lot going on this morning.

Jessica

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407  
Note: Positions or views expressed here do not represent official EPA policy.

Looking for a speaker for your school or community event? <http://www.epa.gov/rtpspeakings/>

---

**From:** Johnson, Yvonne W  
**Sent:** Wednesday, May 16, 2018 8:30 AM  
**To:** Montanez, Jessica <[Montanez.Jessica@epa.gov](mailto:Montanez.Jessica@epa.gov)>  
**Cc:** Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>  
**Subject:** can you please update biogenics slide  
**Importance:** High

Attached is a slide anna plans to use for NACAA next week can you please update. thanks.

---

Thank you,

***Yvonne W. Johnson***  
Special Assistant to the Director  
Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
919-541-3921  
[johnson.yvonnew@epa.gov](mailto:johnson.yvonnew@epa.gov)

# Ex. 5 Deliberative Process (DP)

# Ex. 5 Deliberative Process (DP)

| <div>NSR<br/>Improvement<br/>Projects<br/>Tracker—Data:<br/>02/05/18Project</div> | Target<br>Completion<br>Date | Current Status | Key Milestones | OAQPS staff | OGC staff | Comments |
|---|------------------------------|----------------|----------------|-------------|-----------|----------|
| emissions-units<br>and new-units:   |                              |                |                |             |           |          |

| NSR<br>Improvement<br>Projects<br>Tracker — Date:<br>02/05/18Project | Target<br>Completion<br>Date | Current Status | Key Milestones | OAQPS staff | OGC staff | Comments |
|--|------------------------------|----------------|----------------|-------------|-----------|----------|
|--|------------------------------|----------------|----------------|-------------|-----------|----------|

# Ex. 5 Deliberative Process (DP)

| <div>NSR<br/>Improvement<br/>Projects<br/>Tracker—Data:<br/>02/05/18Project</div> | Target<br>Completion<br>Date | Current Status | Key Milestones | OAQPS staff | OGC staff | Comments |
|---|------------------------------|----------------|----------------|-------------|-----------|----------|
| Ex. 5 Deliberative Process (DP)   |                              |                |                |             |           |          |



| <div>NSR<br/>Improvement<br/>Projects<br/>Tracker—Data:<br/>02/05/18Project</div> | Target<br>Completion<br>Date | Current Status | Key Milestones | OAQPS staff | OGC staff | Comments |
|---|------------------------------|----------------|----------------|-------------|-----------|----------|
|---|------------------------------|----------------|----------------|-------------|-----------|----------|

# Ex. 5 Deliberative Process (DP)

| <div>NSR<br/>Improvement<br/>Projects<br/>Tracker—Data:<br/>02/05/18Project</div> | Target<br>Completion<br>Date | Current Status | Key Milestones | OAQPS staff | OGC staff | Comments |
|---|------------------------------|----------------|----------------|-------------|-----------|----------|
| <div>Ex. 5 Deliberative Process (DP)</div>  |                              |                |                |             |           |          |

| <div>NSR<br/>Improvement<br/>Projects<br/>Tracker -- Date:<br/>02/05/18Project</div> | Target<br>Completion<br>Date | Current Status                        | Key Milestones  | OAQPS staff                        | OGC staff       | Comments |
|--|------------------------------|---------------------------------------|---|------------------------------------|-----------------|----------|
| Biomass  | TBD                          | Brainstorming session held on 1/25/18 | Developing issue paper listing prioritized all potential options for OAQPS, OGC and OAP for editing and discussion. Plan to brief Bill Wehrum in about 3 weeks. | Jessica Montanez<br>Carrie Wheeler | Nora Greenglass |          |

Message

---

**From:** Santiago, Juan [Santiago.Juan@epa.gov]  
**Sent:** 6/1/2017 6:12:29 PM  
**To:** Montanez, Jessica [Montanez.Jessica@epa.gov]  
**Subject:** RE: UPDATE RE: Biomass background paper

Thank you! I've shared it with Mike and we'll see if he is good with it as is.

Juan

---

**From:** Montanez, Jessica  
**Sent:** Thursday, June 01, 2017 2:02 PM  
**To:** Santiago, Juan <Santiago.Juan@epa.gov>  
**Subject:** FW: UPDATE RE: Biomass background paper

Juan,

Here is the latest version reflecting Brian's edit. Please note that we did not add the PSD BACT guidance to the chronology and Bill asked if we should in his Friday, May 26 email. At this point I think the paper is complicated enough to add this too, but I defer to you if you would like us to add that.

### Ex. 5 Deliberative Process (DP)

### Ex. 5 Deliberative Process (DP)

Jessica

Jessica Montañez  
Office of Air Quality Planning and Standards  
Air Quality Policy Division  
New Source Review Group  
109 TW Alexander Drive MD: C504-03 RTP, NC 27711  
Phone: 919-541-3407, Fax: 919-541-5509  
Note: Positions or views expressed here do not represent official EPA policy.

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---

**From:** Irving, Bill  
**Sent:** Thursday, June 01, 2017 10:13 AM  
**To:** Montanez, Jessica <Montanez.Jessica@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Wood, Anna <Wood.Anna@epa.gov>; Santiago, Juan <Santiago.Juan@epa.gov>; Kornylak, Vera S. <Kornylak.Vera@epa.gov>; Johnson, Yvonne W <Johnson.Yvonne@epa.gov>  
**Cc:** Gunning, Paul <Gunning.Paul@epa.gov>; Kocchi, Suzanne <Kocchi.Suzanne@epa.gov>; Fawcett, Allen <Fawcett.Allen@epa.gov>; Birnbaum, Rona <Birnbaum.Rona@epa.gov>; Steller, John <Steller.John@epa.gov>; Ragnauth, Shaun <Ragnauth.Shaun@epa.gov>  
**Subject:** UPDATE RE: Biomass background paper

All – Reid notified us that Sarah is planning to share the biomass paper with Mandy tomorrow (Friday) but will need to review the draft today before finalizing. Are there any additional OAQPS edits/revisions that you want reflected in the version we give to her?

Bill

---

**From:** Montanez, Jessica

**Sent:** Friday, May 26, 2017 4:05 PM

**To:** Irving, Bill <[Irving.Bill@epa.gov](mailto:Irving.Bill@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>; Wood, Anna <[Wood.Anna@epa.gov](mailto:Wood.Anna@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Johnson, Yvonne W <[Johnson.Yvonnew@epa.gov](mailto:Johnson.Yvonnew@epa.gov)>

**Cc:** Gunning, Paul <[Gunning.Paul@epa.gov](mailto:Gunning.Paul@epa.gov)>; Kocchi, Suzanne <[Kocchi.Suzanne@epa.gov](mailto:Kocchi.Suzanne@epa.gov)>; Fawcett, Allen <[Fawcett.Allen@epa.gov](mailto:Fawcett.Allen@epa.gov)>; Birnbaum, Rona <[Birnbaum.Rona@epa.gov](mailto:Birnbaum.Rona@epa.gov)>; Steller, John <[Steller.John@epa.gov](mailto:Steller.John@epa.gov)>; Ragnauth, Shaun <[Ragnauth.Shaun@epa.gov](mailto:Ragnauth.Shaun@epa.gov)>

**Subject:** RE: Biomass background paper

Thanks Bill. We will look at this on Tuesday and offer you some suggestions based on your questions below. Have a great weekend!

Jessica

Jessica Montañez

Office of Air Quality Planning and Standards

Air Quality Policy Division

New Source Review Group

109 TW Alexander Drive MD: C504-03 RTP, NC 27711

Phone: 919-541-3407, Fax: 919-541-5509

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---

**From:** Irving, Bill

**Sent:** Friday, May 26, 2017 3:44 PM

**To:** Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>; Wood, Anna <[Wood.Anna@epa.gov](mailto:Wood.Anna@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Johnson, Yvonne W <[Johnson.Yvonnew@epa.gov](mailto:Johnson.Yvonnew@epa.gov)>; Montanez, Jessica <[Montanez.Jessica@epa.gov](mailto:Montanez.Jessica@epa.gov)>

**Cc:** Gunning, Paul <[Gunning.Paul@epa.gov](mailto:Gunning.Paul@epa.gov)>; Kocchi, Suzanne <[Kocchi.Suzanne@epa.gov](mailto:Kocchi.Suzanne@epa.gov)>; Fawcett, Allen <[Fawcett.Allen@epa.gov](mailto:Fawcett.Allen@epa.gov)>; Birnbaum, Rona <[Birnbaum.Rona@epa.gov](mailto:Birnbaum.Rona@epa.gov)>; Steller, John <[Steller.John@epa.gov](mailto:Steller.John@epa.gov)>; Ragnauth, Shaun <[Ragnauth.Shaun@epa.gov](mailto:Ragnauth.Shaun@epa.gov)>

**Subject:** FW: Biomass background paper

All – here is a clean version of the paper that accepts most of OGC’s comments, re-orders the final section on ‘considerations’, and adds in potential stakeholder reaction. Not surprisingly given what it covers and the level of detail, the document is now long and complex, and might not be ripe for a first conversation with Mandy. Please let us know if you have any ideas on how we could streamline it.

Some specific items to flag for you

- Do we need to add the “biomass as BACT” guidance to the PSD chronology?
- Take a look at the two bullets that OGC added to the SAB section with connects that process both to PSD and the CPP.
- We comprehensively added stakeholder text to the four areas at the end. Please review generally, but in particular edit what is there on PSD/SER.

Attaching OGC’s version again for reference.

Bill

---

**From:** Greenglass, Nora  
**Sent:** Thursday, May 25, 2017 5:32 PM  
**To:** Irving, Bill <[Irving.Bill@epa.gov](mailto:Irving.Bill@epa.gov)>  
**Cc:** Doster, Brian <[Doster.Brian@epa.gov](mailto:Doster.Brian@epa.gov)>  
**Subject:** RE: Biomass background paper

Hi Bill,

Please find attached edits to the biomass paper from Brian, Melina Williams (on the aircraft endangerment issues), and me. Please let us know if you have any questions.

Thank you,  
Nora

---

**From:** Irving, Bill  
**Sent:** Wednesday, May 24, 2017 11:25 AM  
**To:** Greenglass, Nora <[Greenglass.Nora@epa.gov](mailto:Greenglass.Nora@epa.gov)>; Doster, Brian <[Doster.Brian@epa.gov](mailto:Doster.Brian@epa.gov)>  
**Cc:** Wood, Anna <[Wood.Anna@epa.gov](mailto:Wood.Anna@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>; Santiago, Juan <[Santiago.Juan@epa.gov](mailto:Santiago.Juan@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Montanez, Jessica <[Montanez.Jessica@epa.gov](mailto:Montanez.Jessica@epa.gov)>; Johnson, Yvonne W <[Johnson.YvonneW@epa.gov](mailto:Johnson.YvonneW@epa.gov)>; Gunning, Paul <[Gunning.Paul@epa.gov](mailto:Gunning.Paul@epa.gov)>; Fawcett, Allen <[Fawcett.Allen@epa.gov](mailto:Fawcett.Allen@epa.gov)>; Kocchi, Suzanne <[Kocchi.Suzanne@epa.gov](mailto:Kocchi.Suzanne@epa.gov)>; Birnbaum, Rona <[Birnbaum.Rona@epa.gov](mailto:Birnbaum.Rona@epa.gov)>; Ragnauth, Shaun <[Ragnauth.Shaun@epa.gov](mailto:Ragnauth.Shaun@epa.gov)>; Steller, John <[Steller.John@epa.gov](mailto:Steller.John@epa.gov)>  
**Subject:** Biomass background paper

Nora, Brian

Sarah has asked OAQPS & OAP to pull together a background document on the biomass issue, along with some potential options, to prepare for a possible discussion with Mandy and then the Administrator. The attached draft pulls together information on PSD, aircraft endangerment, the appropriations language, and the SAB process. Could you take a look by COB Thursday (tomorrow) and let us know if you have any comments or edits?

Regards,

Bill